

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NATERA, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 20-125 (GBW)
)	(CONSOLIDATED)
ARCHERDX, INC., ARCHERDX, LLC and)	
INVITAE CORP.,)	REDACTED - PUBLIC VERSION
)	Original filing date: April 27, 2023
Defendants.)	Redacted filing date: May 25, 2023

PROPOSED JOINT PRETRIAL ORDER

VOLUME 1

MORRIS, NICHOLS, ARSHT & TUNNELL LLP
Jack B. Blumenfeld (#1014)
Derek J. Fahnestock (#4705)
Anthony D. Raucci (#5948)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@morrisnichols.com
dfahnestock@morrisnichols.com
araucci@morrisnichols.com

Attorneys for Plaintiff Natera, Inc.

April 27, 2023

FARNAN LLP
Brian E. Farnan (#4089)
Michael J. Farnan (#5165)
919 North Market Street, 12th Floor
Wilmington, DE 19801
(302) 777-0300
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

Attorneys for Defendant ArcherDX, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NATERA, INC.,)	
)	
Plaintiff,)	C.A. No. 20-125 (GBW)
)	(CONSOLIDATED)
v.)	
)	
ARCHERDX, INC., ARCHERDX, LLC and)	CONFIDENTIAL-
INVITAE CORP.,)	FILED UNDER SEAL
)	
Defendants.)	

PROPOSED JOINT PRETRIAL ORDER

On May 4, 2023 at 3:30 p.m., counsel for Plaintiff, Natera, Inc. (“Natera”), and Defendants, ArcherDX, Inc., ArcherDX, LLC, and Invitae Corp. (each a “Defendant,” collectively, “Defendants”), will participate in a Pretrial Conference before this Court pursuant to Rule 16 of the Federal Rules of Civil Procedure, D. Del. LR 16.3, the Amended Scheduling Order, dated November 1, 2022 (D.I. 530), and the Court’s Oral Order (D.I. 551). Pursuant to D. Del. LR 16.3(c), the parties hereby submit for the Court’s approval this Joint Pretrial Order (“Order”) governing trial of the actions, which is currently scheduled to commence on May 8, 2023 at 9:30am.

TABLE OF CONTENTS

I.	NATURE OF ACTION AND PLEADINGS	1
A.	Plaintiff	1
B.	Defendants	1
C.	Pleadings and Orders	2
D.	Claim Construction	5
II.	JURISDICTION	5
III.	STATEMENT OF ADMITTED FACTS REQUIRING NO PROOF	6
IV.	STATEMENT OF ISSUES OF FACT TO BE LITIGATED AT TRIAL	6
V.	STATEMENT OF ISSUES OF LAW TO BE LITIGATED AT TRIAL	6
VI.	WITNESSES TO BE CALLED IN PERSON OR BY DEPOSITION	7
A.	Lists of Trial Witnesses	7
B.	Agreements Concerning Trial Witnesses.....	7
C.	Lists of Deposition Designations	9
D.	Agreements Concerning Deposition Designations	9
VII.	EXHIBIT LISTS	12
A.	Lists of Trial Exhibits.	12
B.	Agreements Concerning Trial Exhibits.	13
C.	Demonstratives to be Used in Opening Statements.....	16
D.	Demonstratives to be Used with Witnesses.....	16
E.	Party Lists for Disclosures of Information, Demonstratives, and Exhibits.	17
VIII.	BRIEF STATEMENT OF INTENDED PROOFS	17
IX.	STATEMENT OF ADDITIONAL MATTERS	18
X.	MOTIONS <i>IN LIMINE</i>	18

XI.	MISCELLANEOUS ISSUES	18
A.	Damages.....	18
XII.	OTHER ISSUES	19
A.	Pending Motions	19
B.	Claim Construction	19
C.	Equitable and Injunction Issues	20
D.	Order of Proof.....	20
XIII.	AMENDMENT OF THE PLEADINGS	21
XIV.	LENGTH OF TRIAL.....	21
XV.	CERTIFICATION REGARDING ATTEMPTED RESOLUTION OF CASE	22
XVI.	ORDER TO CONTROL COURSE OF ACTION.....	22

INDEX OF EXHIBITS

STATEMENT OF ADMITTED FACTS REQUIRING NO PROOF

Joint Exhibit 1

STATEMENT OF ISSUES OF FACT TO BE LITIGATED AT TRIAL

Plaintiff Exhibit 2

Defendants Exhibit 3

STATEMENT OF ISSUES OF LAW TO BE LITIGATED AT TRIAL

Plaintiff Exhibit 4

Defendants Exhibit 5

WITNESSES

Plaintiff Exhibit 6

Defendants Exhibit 7

DEPOSITION DESIGNATIONS

Plaintiff Exhibit 8

Defendants Exhibit 9

EXHIBIT LISTS

Plaintiff Exhibit 10

Defendants Exhibit 11

JOINT TRIAL EXHIBIT LIST

Joint Exhibit 12

BRIEF STATEMENT OF INTENDED PROOFS

Plaintiff Exhibit 13

Defendants Exhibit 14

STATEMENT OF ADDITIONAL MATTERS

Plaintiff Exhibit 15

Defendants Exhibit 16

MOTIONS *IN LIMINE* (“MILs”)

Plaintiff’s MILs Exhibit 17

Defendants’ MILs Exhibit 18

I. NATURE OF ACTION AND PLEADINGS

1. This is a consolidated patent infringement action in which Plaintiff Natera, Inc. (“Natera”) asserts that Defendants ArcherDX, Inc., ArcherDX, LLC, and Invitae Corp. (collectively, “Defendants”) infringe U.S. Patent Nos. 10,557,172 (“the ’172 patent”), 10,731,220 (the “’220 patent”), and 10,597,708 (“the ’708 patent”) (collectively “Asserted Patents” or “Patent-in-Suit”). Natera asserts the following claims of the Asserted Patents: Claims 1, 6, and 8 of the ’172 Patent, Claims 1, 3, 4, 6, and 7 of the ’220 Patent, and Claims 1 and 19 of the ’708 Patent (collectively, the “Asserted Claims”).

A. Plaintiff

2. Natera, Inc. (“Natera”) is a corporation organized and existing under the laws of Delaware, with a principal place of business at 201 Industrial Road, San Carlos, California 94070.

3. Natera was the sole owner of, and holder of all substantial rights in, the Asserted Patents at the time it filed the complaints for patent infringement in this case and has maintained sole ownership of the Asserted Patents throughout this litigation.

B. Defendants

4. ArcherDX, Inc. (“ArcherDX”) is a corporation organized and existing under the laws of the state of Delaware, having a principal place of business at 2477 55th Street, Suite 202, Boulder, CO 80301.

5. Effective October 2, 2020, ArcherDX, Inc. merged with Apollo Merger Sub A Inc., which then merged with Apollo Merger Sub B LLC to form ArcherDX, LLC.

6. The Court has substituted ArcherDX, LLC for ArcherDX, Inc. (D.I. 115).

7. Invitae Corp. (“Invitae”) is a corporation organized and existing under the law of the state of Delaware, having a principal place of business at 1400 16th Street, San Francisco,

California 94103.

8. ArcherDX, LLC is a wholly-owned subsidiary of Invitae.

C. Pleadings and Orders

9. Natera initiated suit against ArcherDX on January 27, 2020 when Natera filed a complaint asserting infringement of U.S. Patent Nos. 10,538,814 (“the ’814 patent”). D.I. 1.¹ This action was assigned as Civil Action No. 20-125-LPS (the “20-125 Action”).

10. On March 25, 2020, ArcherDX filed an answer and counterclaims to Natera’s initial complaint in the 20-125 Action and denied that Natera is entitled to any relief and asserted affirmative defenses and counterclaims. D.I. 14. On April 15, 2020, Natera filed an answer to ArcherDX’s counterclaims denying that ArcherDX was entitled to any requested relief. D.I. 18.

11. On April 15, 2020, Natera filed a first amended complaint in the 20-125 Action against ArcherDX asserting infringement of the ’814, ’172, and ’708 Patents, and U.S. Patent No. 10,590,482 (“the ’482 patent”). D.I. 17.

12. On May 13, 2020, ArcherDX filed its answer to the first amended complaint and denied that Natera is entitled to any relief and asserted affirmative defenses and counterclaims. D.I. 21.

13. Natera’s initial and first amended complaints alleged patent infringement and sought a declaratory judgment of patent infringement based on ArcherDX’s manufacture, use, sale, and offer to sell LiquidPlex (previously called Reveal ctDNA), VariantPlex, FusionPlex, ArcherMET, STRATAFIDE, Personalized Cancer Monitoring (“PCM”), and any other oncology products that use the same technology as the previously mentioned products.

14. ArcherDX’s answer to Natera’s initial and first amended complaints denied that

¹ Unless specified, the D.I. citations refer to the docket entries in the consolidated 20-125 Action.

Natera is entitled to any relief and asserted affirmative defenses including non-infringement; invalidity under 35 U.S.C. §§ 101, 102, 103, 112; no injunctive relief; safe harbor; no exceptional case under 35 U.S.C. § 285; unclean hands; and prosecution laches. ArcherDX also asserted counterclaims for declaratory judgment of non-infringement and invalidity under 35 U.S.C. §§ 101, 102, 103, 112, and improper inventorship of the '814, '172, '482, and '708 Patents. D.I. 21.

15. On June 4, 2020, ArcherDX filed a motion for judgment on the pleadings under Federal Rule of Civil Procedure 12(c) for lack of subject matter jurisdiction and failure to state a claim. D.I. 23. On October 13, 2020, the Court issued an order denying ArcherDX's motion. D.I. 63.

16. On August 6, 2020, Natera filed a complaint against ArcherDX in a separate case asserting infringement of the '220 patent. D.I. 1 (Case No. 1:20-cv-01047). This action was assigned the Civil Action No. 20-1047-LPS (the "20-1047 Action"). The complaint alleged patent infringement and sought a declaratory judgment of patent infringement based on ArcherDX's manufacture, use, sale, and offer to sell of ArcherDX's LiquidPlex (previously called Reveal ctDNA), VariantPlex, STRATAFIDE, Personalized Cancer Monitoring ("PCM"), and ArcherMET products, and any other oncology products that use the same technology as the previously mentioned products.

17. In both actions, Natera sought (1) a judgment of infringement of the patents that were asserted in the complaints; (2) an order enjoining ArcherDX, Inc., its officers, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith from further infringement of the patents asserted in the complaints; (3) damages or other monetary relief together with interest; (4) a determination that the case is an exceptional case and that Natera be awarded its attorneys' fees pursuant to 35 U.S.C. § 285; (5)

Natera's costs and expenses in the case; and (6) other and further relief as the Court deems just and appropriate.

18. On August 27, 2020, ArcherDX filed an answer and counterclaims to Natera's complaint in the related 20-1047 Action. D.I. 8 (20-1047 Action). ArcherDX denied that Natera was entitled to any relief from ArcherDX and asserted all affirmative defenses listed in ¶ 14 *supra* with an additional defense that Natera cannot enforce its patent due to inequitable conduct during prosecution of the '220 Patent.

19. On September 25, 2020, the Court entered an Order consolidating the two civil actions, ordering that "[a]ll future filings shall be made only in the -125 action." D.I. 52.

20. On January 12, 2021, Natera filed a second amended complaint in the consolidated 20-125 Action adding as Defendant parties, ArcherDX, LLC and Invitae Corp. in view of ArcherDX's merger with Invitae Corp. causing ArcherDX to merge with various subsidiaries to form ArcherDX, LLC. D.I. 116. Natera alleged infringement of the Patents-in-Suit and sought a declaratory judgment of patent infringement based on the Defendants' manufacture, use, sale, and offer to sell of LiquidPlex (previously called Reveal ctDNA), VariantPlex, FusionPlex, STRATAFIDE, Personalized Cancer Monitoring ("PCM"), and ArcherMET products, and any other oncology products that use the same technology as the previously mentioned products.

21. On January 26, 2021, ArcherDX filed an answer and counterclaims to Natera's second amended complaint. D.I. 128.

22. On February 9, 2021, Natera filed an answer to ArcherDX's counterclaims denying that ArcherDX was entitled to any requested relief. D.I. 134.

23. On February 05, 2021, Defendants filed an answer and counterclaims to Natera's second amended complaint. D.I. 133.

24. On February 22, 2021, Natera filed an answer to Defendants' counterclaims denying that Defendants were entitled to any requested relief. D.I. 147.

25. In Defendants' answers and counterclaims (D.I. 128 and 133), Defendants denied that Natera was entitled to any relief, and asserted affirmative defenses and sought counterclaims listed in ¶¶ 14 and 18 *supra* above.

26. On August 31, 2021, Natera moved for leave to file a third amended complaint to include corrected language of Claim 1 of the '482 Patent, which Defendants opposed on September 7, 2021. D.I. 304, 316. The Court granted Natera's motion for leave to file the third amended consolidated complaint on October 25, 2021. D.I. 382. On October 27, 2021, Natera filed a third amended complaint in the 20-125 Action with the corrected language of Claim 1 of the '482 Patent. D.I. 391.

27. On November 3, 2021, Defendants answered the third amended complaint with a modification of their defenses and counterclaims to include inequitable conduct of the '814, '172, and '482 Patents. D.I. 393. On November 10, 2021, Natera filed an answer to Defendants' counterclaims denying that Defendants were entitled to any requested relief. D.I. 395.

D. Claim Construction

28. The Court held a claim construction hearing on April 26, 2021. On June 28, 2021, the Court issued a Memorandum Opinion and an Order construing five disputed terms: (1) "target loci;" (2) "nested PCR;" (3) "annealing step;" (4) "sequencing tag;" and (5) "a melting temperature of the at least 2 primers." D.I. 243.

II. JURISDICTION

29. This action arises out of the patent laws of the United States, Title 35, United States Code.

30. The jurisdiction of this Court is not disputed and is based on 28 U.S.C. §§ 1331, 1338(a), 2201, and 2202.

31. Venue is proper in this District Court pursuant to 28 U.S.C. § 1400(b). No party contests venue.

III. STATEMENT OF ADMITTED FACTS REQUIRING NO PROOF

32. The parties' statement of uncontested facts is set forth in Exhibit 1. These uncontested facts require no proof at trial and will become part of the evidentiary record in this action.

IV. STATEMENT OF ISSUES OF FACT TO BE LITIGATED AT TRIAL

33. Natera's statement of issues of fact that remain to be litigated is set forth in Exhibit 2.

34. Defendants' statement of issues of fact that remain to be litigated is set forth in Exhibit 3.

35. If any statement in a party's statement of issues of fact that remain to be litigated should properly be considered an issue of law, then such statement shall be considered as an issue of law.

V. STATEMENT OF ISSUES OF LAW TO BE LITIGATED AT TRIAL

36. Natera's statement of issues of law that remain to be litigated is set forth in Exhibit 4.

37. Defendants' statement of issues of law that remain to be litigated is set forth in Exhibit 5.

38. If any statement in a party's statement of issues of law that remain to be litigated should properly be considered an issue of fact, then such statement shall be considered as an issue

of fact.

VI. WITNESSES TO BE CALLED IN PERSON OR BY DEPOSITION

A. Lists of Trial Witnesses

39. Natera's good faith list of the witnesses that it currently intends to call at trial, either live or by deposition, is attached as Exhibit 6.

40. Defendants' good faith list of the witnesses that they currently intend to call at trial, either live or by deposition, is attached as Exhibit 7.

B. Agreements Concerning Trial Witnesses

41. The parties will identify by email to the other side the final list of the witnesses to be called live no later than 7:30 pm ET on May 2, 2023, understanding that either party reserves the right not to call a witness live as the trial develops and/or in response to Court rulings.

42. The parties agree that they shall provide to the other side by 7:30 p.m. ET, two (2) calendar days before a witness is called live on direct examination at trial, the name of each witness expected to be called and the order in which the witnesses are expected to be called. Any objection to a witness shall be provided no later than 7:30 p.m. ET one (1) calendar day before the witness is expected to testify. The parties shall meet and confer to resolve any objections by 9:30 p.m. ET on the same night objections are received to resolve any objections. Any objections that cannot be resolved may be raised with the Court at the Court's convenience before trial resumes on the day the witness is expected to testify.

43. If later events at trial cause the need to remove, reorder, or withdraw a witness from a party's witness list, the parties agree to notify the other party in good faith as soon as possible. Provided, however, that if a party removes, reorders, or withdraws a witness, the opposing party may still assert prejudice due to such a change and reserve the right to seek relief from the Court.

44. Fact witnesses to be called to testify in person shall be sequestered and may not be present in the courtroom during other witness testimony or review the transcripts of the trial testimony of other witnesses until after they provide their live testimony and have been excused. This provision does not apply to one designated corporate representative for each side, who will be permitted to attend the entire trial. Expert witnesses and a party's corporate representative need not be sequestered and may be present in the courtroom during trial and/or review transcripts of trial testimony.

45. All witnesses need to be on the parties' witness lists in the Pretrial Order. Any witness not listed in the exhibits referenced above will be precluded from testifying absent good cause shown.

46. The listing of a witness on a party's pre-trial witness list does not require that party to call that witness to testify and does not necessarily mean that the listing party has the power to compel the live testimony of that witness.

47. The parties are not permitted to recall fact witnesses to testify multiple times; an expert witness may testify separately if solely on each of infringement and invalidity.

48. Pursuant to D. Del. LR 43.1, once direct examination of a witness is concluded and until cross examination of that witness is concluded, counsel offering the witness on direct examination shall not:

(a) Consult or confer with the witness regarding the substance of the witness' testimony already given or anticipated to be given, except for the purpose of conferring on whether to assert a privilege against testifying or on how to comply with a court order; or

(b) Suggest to the witness the manner in which any questions should be answered.

49. The parties' witness lists represent the parties' good faith understanding and

expectation about which witnesses are expected to be called live in person, or by deposition, at trial. To the extent that a witness's circumstances change, or a witness otherwise becomes unavailable for trial, each party reserves the right to call that witness by deposition to the extent permitted under the Federal Rules of Civil Procedure and the Federal Rules of Evidence and subject to resolution of objections by the other party.

C. Lists of Deposition Designations

50. Natera's list of deposition designations, Defendants' objections to Natera's designations, Defendants' counter-designations, and Natera's objections to Defendants' counter-designations, are attached as Exhibit 8.

51. Defendants' list of deposition designations, Natera's objections to Defendants' designations, Natera's counter-designations, and Defendants' objections to Natera's counter-designations, are attached as Exhibit 9.

D. Agreements Concerning Deposition Designations

52. For purposes of Exhibits 8 and 9, the parties will provide affirmative designations for the other side's or third-party witnesses only.

53. The parties shall disclose a list of any witness they intend to call by deposition, including the particular designated deposition testimony by page and line number, including specific tape or disk number, volume, and start/end times from the relevant deposition videos, the manner in which the deposition will be used, either by video or reading the transcript into the record, and any exhibits that will be admitted through the testimony by 7:30 p.m. ET [**NATERA'S PROPOSAL: two (2)**] [**DEFENDANTS' PROPOSAL: three (3)**] calendar days before such testimony and exhibits will be offered. The other party shall identify any objections to the admissibility of the testimony or exhibits and counter-designations by 7:30 p.m. ET [**NATERA'S**

PROPOSAL: one (1)] [**DEFENDANTS' PROPOSAL:** two (2)] calendar day before use.

54. The parties shall meet and confer by 9:30 p.m. ET on the same night objections are received to resolve any objections to designated testimony and counter-designations.

[**NATERA'S PROPOSAL:** Any objections that cannot be resolved may be raised with the Court at the Court's convenience before trial resumes on the day of the anticipated use.]

[**DEFENDANTS' PROPOSAL:** If there are objections that remain to be resolved, the party calling the witness by deposition, shall, no later than 6:00 a.m. one (1) day before the witness is to be called by deposition at trial, submit on behalf of the parties: (i) a copy of the entire deposition testimony of the witness at issue, clearly highlighting the designations, and counter-designations, and pending objections; (ii) any exhibits to be introduced with the deposition testimony if there remains a pending objection to that exhibit, and (iii) a cover letter clearly identifying the pending objections as well as a brief indication (*i.e.*, no more than one sentence per objection) of the basis for the objection and the offering party's response to it. Failure to comply with these procedures, absent an agreement by the parties and approval by the Court, will result in waiver of the use of the deposition testimony or waiver of objection to the use of the deposition testimony.] In the event a party is in a position to make an early disclosure under this paragraph, the parties agree to meet and confer in good-faith on a revised schedule for providing objections and meeting and conferring.

55. Deposition testimony may be admitted by reading the transcript or playing a videotape/DVD of the deposition at trial, as directed by the Court. The parties agree that any exhibits referenced in deposition testimony that is read or played to the jury are admissible.

56. When deposition designation excerpts are introduced, all admissible deposition counter-designation excerpts will be offered in the same format as the affirmative designations,

either by videotape or by transcript, and will be introduced simultaneously in the sequence in which the testimony was originally given [**NATERA'S PROPOSAL:**, minus any attorney objections. If by video, the deposition video shall include subtitles of the testimony at the bottom of the screen that matches the witness's testimony]. The parties will be charged for time according to the following proportions: each side shall be charged only with the time needed to read or play its own designations or counter-designations, and will not be charged with the time necessary to read or play the other side's designations or counter-designations.

57. The party calling the witness by deposition shall be responsible for editing the deposition transcript or video as stipulated herein and to provide a final version of the transcript or video to the other party [**NATERA'S PROPOSAL:** party as soon as any final rulings are obtained from the Court and the editing is complete] [**DEFENDANTS' PROPOSAL:** no later than 8:00 pm ET the day before the deposition testimony is expected to be played, or state in writing that the deposition will be read into the record].

58. For those witnesses whose depositions will be played or read, the parties shall be permitted to make brief transition statements limited to introducing the witnesses by name, position or title, and/or the company with which he or she is associated, the time for which shall be charged to the party offering the witness's testimony, unless otherwise agreed to by the parties. However, counsel shall not be permitted to argue or comment on the evidence during transition statements.

59. Each party reserves the right to use designations identified by the other party either as counter-designations or as affirmative designations. Each party reserves the right to use affirmatively any of its counter-designations as if identified as the party's affirmative designation. Each party reserves the right to use the designated section in whole or in part either through video

presentation, slide presentation or read aloud. Each party reserves the right to supplement, amend, or withdraw its list of deposition designations in response to any additional disclosures by the other party and/or as may be needed to rebut any facts or evidence presented by the other party at trial or in response to any rulings by the Court. These deposition designations should not be construed as acknowledgement of the scope of the trial or admissibility of evidence. Designation of any portion of a transcript does not waive each party's right to contend the admissibility of the witnesses' testimony nor does it constitute a waiver of any admissibility arguments that each party may raise. Designation of any testimony does not imply admissibility.

VII. EXHIBIT LISTS

A. Lists of Trial Exhibits.

60. Natera's list of exhibits it intends to offer at trial, except demonstrative exhibits and exhibits used solely for impeachment, and Defendants' objections thereto, is attached as Exhibit 10.

61. Defendants' list of exhibits they intend to offer at trial, except demonstrative exhibits and exhibits used solely for impeachment, and Natera's objections thereto, is attached as Exhibit 11.

62. The parties' joint exhibit list is attached as Exhibit 12. The inclusion of an exhibit on the joint exhibit list does not waive any objection that a party may have to the use or proffer of the exhibit by the other party. The listing of a document on a party's exhibit list or the joint exhibit list is not an admission that such document is relevant or admissible when offered by the opposing party for the purpose that the opposing party wishes to admit the document. The parties' objections to these exhibits, to the extent they are offered by the other party, are included in the joint exhibit list.

63. The parties will offer as exhibits at trial one or more exhibits set forth on their respective exhibit list or the joint exhibit list. These lists include the exhibit number to be used at trial and a description sufficient to identify the exhibit, e.g., by production number, deposition exhibit number, or otherwise. A party's failure to introduce any exhibit appearing on its list shall not be commented on during trial.

64. On or before the first day of trial, Natera and Defendants will jointly deliver to the Courtroom Deputy a completed AO Form 187 exhibit list of the joint exhibits and each parties' exhibits and witness list that includes the witnesses for each party.

B. Agreements Concerning Trial Exhibits.

65. The exhibit prefixes shall be: "JTX" for exhibits on the Joint Exhibit List; "PTX" for exhibits on Natera's Exhibit List; and "DTX" for exhibits on Defendants' exhibit list. The page numbering shall begin at 1 for the first page of each exhibit and the numbering on each page should include the trial exhibit number and the physical page number separated by a decimal. For example, page 10 of Joint Exhibit 1 would be endorsed / paginated as either: "JTX-0001-10" or "JTX-1-10."

66. Each party will provide by e-mail to opposing counsel a list, separately for each witness, of all exhibits (by exhibit number) a party intends to use in direct examination of non-adverse witnesses by 7:30 p.m. ET one (1) calendar day before they will be used at trial. For example, a listing of all exhibits intended for use during direct examination of a non-adverse witness on Monday, May 8, 2023 would be exchanged by e-mail before 7:30 p.m. on Sunday, May 7, 2023. The party receiving identification of exhibits intended for use in direct examination of non-adverse witnesses shall inform the party identifying the exhibits of any objections by 9:00 p.m. ET the same day, and the parties shall meet and confer as soon as possible thereafter, but by

no later than 9:30 p.m. ET the same day to resolve such objections. Any unresolved objections shall be brought to the Court's attention for resolution no later than the start of the trial day on which the exhibit is intended to be used. The parties agree that there may be circumstances at trial where a party may need additional time to submit rebuttal witness exhibits on direct examination or objections thereto or to prepare for a meet and confer conference. The parties agree to amend these deadlines, as needed and any amendment shall not be unreasonably withheld, if a good-faith basis for extending the deadline comes up.

67. Prior to the start of direct examination of a witness, the party conducting the direct examination will provide the other party with two (2) copies of binders containing all exhibits and demonstrative exhibits that they intend to use with that witness on direct examination and will provide all required copies to the Court. The parties agree that this provision does not require advance disclosure of exhibits to be used to impeach or on cross-examination of any witness. However, prior to the start of the cross-examination of any witness, the parties agree to provide the witness a copy and the other side with two (2) copies of binders that contain all of the exhibits expected to be used on cross-examination of that witness and will provide all required copies to the Court. If a witness on cross-examination is held over at the end of a trial day, all copies of the binders provided to the other party and witness containing all exhibits to be used during cross-examination shall be returned to counsel conducting the cross-examination until testimony resumes.

68. Each party reserves the right to use exhibits from the other party's trial exhibit list, even if not separately listed on its own exhibit list. However, recognizing that a party has a right to object to use of its own listed exhibits by the other side, the parties have agreed that all such objections are preserved and need not be disclosed in advance of trial.

69. The parties agree that any description of a document on an exhibit list is provided for convenience only and shall not be used as an admission or otherwise as evidence regarding the listed document or any other listed document.

70. A party may not introduce at trial any exhibit not appearing on its list, another party's list, or on the parties' joint exhibit list, except for exhibits used solely for impeachment. Such exhibits, if not appearing on a party's exhibit list or the joint exhibit list, shall not be admissible unless good cause is shown.

71. The parties agree that any exhibit identified on a party's exhibit list and not objected to is deemed to be admissible and may be entered into evidence by the party, provided all other requirements for the admissibility of exhibits have been met, except that nothing herein shall be construed as a stipulation or admission that the document is entitled to any weight in deciding the merits of this case.

72. The parties agree that the following categories of documents shall be deemed *prima facie* authentic, subject to all other objections regarding admissibility: All responses to Interrogatories and Requests for Admission; and Certified copies of United States patents, applications, and file histories.

73. Any trial exhibit that was produced in discovery by a party and that on its face appears to have been authored by an employee, officer, or agent of the party producing such document, shall be deemed a true and correct copy of a document maintained in that party's files as of the date of the party's document collection under Federal Rule of Evidence 901.

74. No later than a date to be agreed upon by the parties, the parties shall supplement any damages calculations performed by their respective experts using this supplemental data. Upon a jury verdict of infringement, the parties shall perform an accounting for the period January

1, 2023 through the date of the verdict to determine damages for that period, including a reasonably royalty and, if awarded by the jury, lost profits.

75. The parties have prepared objections to opposing parties' proposed trial exhibits without the benefit of knowing exactly how opposing parties intend to use their listed exhibits at trial. The parties expressly reserve all objections as to foundation until the parties know how an exhibit will be used at trial, including foundation objections as to third party documents. Any party's objection to any exhibit that appears on both that party's and the opposing parties' trial exhibit lists in no way prejudices that party's ability to introduce the exhibit for a proper purpose at trial.

C. Demonstratives to be Used in Opening Statements.

76. Natera's demonstratives will be identified with PDX numbers.

77. Defendants' demonstratives will be identified with DDX numbers.

78. The parties shall exchange complete representations of any demonstratives or exhibits (in color if in color, and with animations, if applicable) that they intend to use in opening statements no later than 3:00 p.m. ET on May 7, 2023. The parties shall exchange any objections to opening statement demonstratives by 6:00 p.m. ET that evening. The parties agree that demonstratives need not be exchanged for closing statements.

79. The parties shall meet and confer by 8:00 p.m. ET on the same night to resolve any objections. Any objections to their use that cannot be resolved shall be raised with the Court at the Court's convenience before trial begins.

D. Demonstratives to be Used with Witnesses.

80. The parties shall exchange complete representations of any demonstrative exhibits or Rule 1006 exhibits (in color if in color, and with animations, if applicable) that they intend to

use during the direct examination of a witness, including any witness called in rebuttal of the other party's witnesses, no later than 7:30 p.m. ET the night before they will be used in Court. The parties shall exchange any objections thereto by 9:00 p.m. ET on the same night. This paragraph shall not apply to the ballooning, excerpting, enlargement or highlighting of a portion of a trial exhibit that was otherwise properly disclosed, to demonstratives created during testimony or otherwise live at trial, or to demonstrative exhibits to be used for cross-examination.

81. The parties shall meet and confer by 9:30 p.m. ET on the same night to resolve any objections to demonstrative exhibits or Rule 1006 exhibits that are disclosed no later than 7:30 pm ET the night before they are used in Court. Any objections to their use that cannot be resolved shall be raised with the Court at the Court's convenience before trial resumes on the day of the anticipated use.

E. Party Lists for Disclosures of Information, Demonstratives, and Exhibits.

82. Disclosure of the information, exhibits, and demonstratives discussed above shall be directed to the following via electronic mail:

Counsel for Natera:	Counsel for Defendants:
Natera-Archerdxmweteam@mwe.com	ArcherDX.Natera@weil.com
jblumenfeld@morrisnichols.com	bfarnan@farnanlaw.com
dfahnestock@morrisnichols.com	mfarnan@farnanlaw.com
araucci@morrisnichols.com	

VIII. BRIEF STATEMENT OF INTENDED PROOFS

83. Natera's brief statement of intended proofs is set forth in Exhibit 13.

84. Defendants' brief statement of intended proofs is set forth in Exhibit 14.

IX. STATEMENT OF ADDITIONAL MATTERS

85. Natera's statement of additional matters is set forth in Exhibit 15.

86. Defendants' statement of additional matters is set forth in Exhibit 16.

X. MOTIONS IN LIMINE

87. Natera's motions *in limine* is set forth in Exhibit 17.

88. Defendants' motions *in limine* is set forth in Exhibit 18.

XI. MISCELLANEOUS ISSUES

A. Damages

89. Natera intends to seek the following relief:²

- a. Lost profits related to Personalized Cancer Monitoring ("PCM") contracts from Defendants.
- b. If the requested lost profits are awarded, a reasonable royalty from Defendants.
- c. If the requested lost profits are not awarded, a reasonable royalty for Accused Products from Defendants.
- d. Pre-judgment and post-judgment interest, costs, and attorneys' fees. 35 U.S.C. §§ 284, 285.
- e. A permanent injunction preventing Defendants from future infringement of the '172 Patent, '220 Patent, and/or '708 Patent.

² By Natera: Pursuant to Fed. R. Civ. P. 26, Defendants are required to supplement their production of damages-related financial documents. Natera requested supplementation of such documents through December 31, 2022 by March 31, 2023. Natera has not yet received all of Defendants' supplemental financial information. Natera reserves the right to update its damages calculations in light of Defendants' supplementation of this production, and seeks an accounting for damages incurred between the last date for which Defendants have provided adequate financial supplementation through the date of the verdict.

XII. OTHER ISSUES

A. Pending Motions

1. *Daubert* Motions

90. On January 21, 2023, Natera filed its Motions for Partial Summary Judgment and to Preclude Certain Expert Testimony and accompanying materials. D.I. 429, 431, 432, 433. Defendants filed their opposition and accompanying materials on February 11, 2022. D.I. 441, 444. On February 25, 2022, Natera filed its reply and accompanying materials. D.I. 450, 451.

91. On January 21, 2022, Defendants filed their Motions for Summary Judgment and *Daubert* Motion to Exclude Expert Testimony and accompanying materials. D.I. 428, 430, 434. Natera filed its opposition and accompanying materials on February 11, 2022. D.I. 442, 443. On February 25, 2022, Defendants filed their reply and accompanying materials. D.I. 449, 452.

92. The Court has not yet ruled on the parties' *Daubert* motions.

B. Claim Construction

93. The construction of the disputed term “a melting temperature of the at least 2 primers” (’708 Patent, Claim 1), is an issue of law to be resolved by the Court in the first instance. As briefed and argued at the summary judgment hearing (D.I. 549), the parties dispute the meaning of “at least 2 primers” in the application of the claim.

94. Natera’s position is that the claim term only requires that there be at least 2 primers with an annealing temperature for the reaction conditions that is greater than the melting temperature. *See, e.g.*, D.I. 549, 73:13-81:24. Defendants’ position is that all of the primers must have an annealing temperature for the reaction conditions that is greater than the melting temperature. *See, e.g.*, D.I. 549, 67:15-69:20. The parties respectfully request that the Court address and rule on the parties’ claim construction dispute to streamline the triable issues before

the jury trial.

C. Equitable and Injunction Issues

95. [NATERA'S PROPOSAL: A separate bench trial should be held on Defendants' equitable defenses of inequitable conduct prosecution laches, unclean hands, and inventorship. The parties should be precluded from mentioning, introducing or otherwise relying on any evidence, argument or testimony during the jury trial relating to the equitable issues, including referencing the fact that each party sued the other without providing notice in advance of filing the lawsuit.]

96. [DEFENDANTS' PROPOSAL: Defendants' equitable defenses of inequitable conduct, prosecution laches, and inventorship should be presented to the jury, and the jury at least be allowed to render an advisory verdict.]

97. The parties propose that a separate bench trial be held on Natera's request for injunctive relief. [NATERA'S PROPOSAL: Injunction is an issue of law for the Court to decide and the parties should be precluded from mentioning, introducing or otherwise relying on any evidence, argument or testimony during the jury trial regarding Natera's decision to seek injunctive relief and any suggestion that Natera will take Defendants' products off the market or put Defendants out of business.]

D. Order of Proof

98. With respect to the order of proof, the parties propose the following presentation of evidence:

- a. Opening Statements
 - i. Natera
 - ii. Defendants

- b. Natera's presentation on issues with respect to which Natera bears the burden of proof (Infringement and Damages)
- c. Defendants' presentation of rebuttal evidence on issues with respect to which Natera bears the burden of proof (Non-infringement and Damages) & Defendants' presentation on issues with respect to which Defendants' bear the burden of proof (Invalidity [**DEFENDANTS' PROPOSAL:** and Unenforceability]³)
- d. Natera's presentation of rebuttal evidence on issues with respect to which Defendants bear the burden of proof (Validity [**DEFENDANTS' PROPOSAL:** and Enforceability])
- e. Closing Statements
 - i. Natera
 - ii. Defendants
 - iii. Natera's Rebuttal

99. The parties wish to discuss with the Court how it would like to handle limited confidential information, including confidential information of third parties.

XIII. AMENDMENT OF THE PLEADINGS

100. The parties reserve the right to request amendment to the pleadings.

XIV. LENGTH OF TRIAL

101. Trial will commence on May 8, 2023, at 9:30 a.m. The parties currently anticipate

³ By Natera: Natera requests that a separate bench trial be held on all equitable defenses asserted by Defendants. Further, the parties should be precluded from mentioning, introducing, or otherwise relying on any evidence, argument or testimony relating to Defendants' equitable defenses during the jury trial because such issues are not relevant and will be prejudicial to the parties.

it will take approximately 5 trial days, with approximately six hours of trial time per day, to try the case. As set forth in the Scheduling Order entered by the Court, “the parties should plan on being allocated a total number of hours in which to present their evidence and argument.” Considering the foregoing and the nature and extent of the parties’ disputes, the parties request a total of 32 hours for their trial presentation, allocated as 16 hours per side. **[NATERA’S PROPOSAL:** An injunction hearing, if necessary, will be held on or about May 2023, subject to the Court’s availability. A hearing on Defendants’ equitable defenses, if necessary, will be held on or about May 2023, subject to the Court’s availability.]

102. The trial will be timed. Unless otherwise ordered, time will be charged to a party for its opening statement, direct and redirect examination of a witness it calls (including by designation), cross-examination of witnesses called by the opposing party (including by designation), closing statement, its argument on any motion for judgment as a matter of law, and all sides’ arguments on objections a party raises (outside the presence of the jury) to another party’s exhibits and demonstrative exhibits.

103. The Courtroom Deputy will keep a running total of trial time used by counsel. If a party uses all of its allotted trial time, the Court will terminate that party’s trial presentation.

XV. CERTIFICATION REGARDING ATTEMPTED RESOLUTION OF CASE

104. The parties certify that they have engaged in good faith efforts to explore resolution of this case by settlement. The parties remain interested in an amicable resolution. To date however, no agreement has been reached between the parties.

XVI. ORDER TO CONTROL COURSE OF ACTION

105. This Order shall control the subsequent course of this action, unless modified by the Court to prevent manifest injustice or for good cause shown.

106. The parties reserve their respective rights to propose modifications to this Order, including the exhibits thereto, based on subsequent rulings of the Court or for other good cause.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

FARNAN LLP

/s/ Derek J. Fahnestock

/s/ Brian E. Farnan

Jack B. Blumenfeld (#1014)
Derek J. Fahnestock (#4705)
Anthony D. Raucci (#5948)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@morrisnichols.com
dfahnestock@morrisnichols.com
araucci@morrisnichols.com

Brian E. Farnan (#4089)
Michael J. Farnan (#5165)
919 North Market Street, 12th Floor
Wilmington, DE 19801
(302) 777-0300
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

Attorneys for Defendant ArcherDX, Inc.

Attorneys for Plaintiff Natera, Inc.

April 27, 2023

SO ORDERED this ____ day of _____, 2023.

UNITED STATES DISTRICT JUDGE

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NATERA, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 20-125 (GBW)
)	(CONSOLIDATED)
ARCHERDX INC., ARCHERDX LLC, and)	
INVITAE CORPORATION)	
)	
Defendants.		

EXHIBIT 1: JOINT STATEMENT OF UNCONTESTED FACTS

In accordance with Local Rule 16.3(c)(3) of the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware, Plaintiff Natera, Inc. (“Plaintiff” or “Natera”) and Defendants ArcherDX, Inc., ArcherDX, LLC and Invitae Corporation (collectively, the “Defendants” or “Archer”) submit the following joint statement of facts that are undisputed or have been agreed or stipulated to by the parties.

I. THE PARTIES AND NATURE OF THE CASE

A. Plaintiff

1. Plaintiff Natera, Inc. is a corporation organized and existing under the laws of Delaware, having a principal place of business at 201 Industrial Road, San Carlos, California 94070.

B. Defendants

2. Defendant ArcherDX, LLC, formerly ArcherDX, Inc. is a corporation organized and existing under the laws of the state of Delaware, having a principal place of business at 2477 55th Street, Suite 202, Boulder, CO 80301. On October 2, 2020, ArcherDX, Inc. merged with Apollo Merger Sub A Inc., which then merged with Apollo Merger Sub B LLC to form ArcherDX, LLC.

3. Defendant Invitae Corporation is a corporation organized and existing under the law of the state of Delaware, having a principal place of business at 1400 16th Street, San Francisco, California 94103.

4. Defendant ArcherDX, LLC is a wholly-owned subsidiary of Invitae.

C. Nature of the Case

5. This is an action for patent infringement arising under the patent laws of the United States, Title 35, United States Code, § 1, *et seq.*

6. Natera has alleged infringement of U.S. Patent Nos. 10,557,172 (the “’172 Patent”); 10,597,708 (the “’708 Patent”); and 10,731,220 (the “’220 Patent”) (collectively, the “Asserted Patents” or “Patents-in-Suit”) against Defendants.

7. Defendants have asserted affirmative defenses and counterclaims of non-infringement, invalidity, and unenforceability of the Asserted Patents.

8. Subject matter jurisdiction over this action is proper pursuant to 28 U.S.C. §§ 1331, 1338(a), 2201 and 2202.

9. Venue for this action is proper in the District of Delaware pursuant to 28 U.S.C. §§ 1391(b), 1391(c), and 1400(b).

10. This Court has personal jurisdiction over the parties.

II. THE ACCUSED PRODUCTS

11. Natera accuses the following products of infringement of the ’172 and ’220 Patents (“the cfDNA Accused Products”): LiquidPlex, STRATAFIDE, and PCM, and all assays based on the above-listed products, including comprehensive kits.

12. Natera accuses the following products of infringement of the ’708 Patent (“the ’708 Accused Products”): VariantPlex, FusionPlex, STRATAFIDE, and PCM, and all assays based on the above-listed products, including comprehensive kits. Collectively, the cfDNA Accused Products and the ’708 Accused Products are referred to as the “Accused Products.”

III. THE PATENTS-IN-SUIT

A. The ’172 Patent

13. The ’172 Patent is titled “Methods for Simultaneous Amplification of Target Loci.”

14. The assignee listed on the face of the ’172 Patent is Natera, Inc.

B. The ’220 Patent

15. The '220 Patent is titled "Methods for Simultaneous Amplification of Target Loci."

16. The assignee listed on the face of the '220 Patent is Natera, Inc.

C. The '708 Patent

17. The '708 Patent is titled "Methods for Simultaneous Amplifications of Target Loci."

18. The assignee listed on the face of the '708 Patent is Natera, Inc.

IV. CLAIM CONSTRUCTION

19. On June 28, 2021, the Court construed the terms below to have the following meanings (D.I. 243):

CLAIM TERM	CLAIM CONSTRUCTION
"target loci" '172 Patent, claims 1, 5-7; '220 Patent, claims 1, 6-7, 16-17; and '708 Patent, claims 1, 19	selected segments of nucleic acid of interest of an individual
"nested PCR" '172 Patent, claim 1; and '220 Patent, claims 1, 4	a subsequent round or rounds of PCR amplification using one or more new primers that bind internally, by at least one base pair, to the primers used in a previous round
"annealing step" '172 Patent, claim 13; '220 Patent, claim 14; and '708 Patent, claim 1	a step in the amplification process to allow one or more primers to hybridize to their complementary sequences
"sequencing tag" '220 Patent, claim 1	a nucleic acid sequence introduced to carry out the process of high throughput sequencing
"a melting temperature of the at least 2 primers" '708 Patent, claim 1	the temperature at which one-half (50%) of a DNA duplex of each primer and its perfect complement dissociates and becomes single strand DNA

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NATERA, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 20-125 (GBW)
)	(CONSOLIDATED)
ARCHERDX INC., ARCHERDX LLC, and)	
INVITAE CORPORATION)	
)	
Defendants.		

**EXHIBIT 2: NATERA’S STATEMENT OF FACTS THAT REMAIN TO BE
LITIGATED**

Natera respectfully submits the following statement of issues of fact that remain to be litigated. Further details regarding these issues have been explained at length in Natera's pleadings and discovery responses, including in its contentions, interrogatory responses, expert reports, by experts at depositions and by fact witnesses at depositions, which Natera incorporates by reference. Should the Court determine that any issue identified in this list is more properly considered an issue of law, it shall be so considered and Natera incorporates such issue into Natera's Statement of Issues of Law That Remain to be Litigated (Ex. 4 to Proposed Final Pretrial Order). To the extent that Natera's Statement of Issues of Law That Remain to be Litigated contains issues that the Court deems to be issues of fact, those issues are incorporated herein by reference. Natera reserves the right to revise, modify, supplement, or change the issues of fact to be litigated in response to subsequent Court rulings and/or Defendants' identification of issues of law and fact to be litigated or any new issues Defendants may raise, or for other good cause. The following statement of issues of fact is not exhaustive and Natera reserves the right to prove any matters identified in the pleadings and discovery responses, including in its contentions, expert reports, by experts at depositions, and by fact witnesses at depositions. Natera further intends to offer evidence to rebut evidence offered by Defendants.

I. ISSUES ON WHICH NATERA BEARS THE BURDEN OF PROOF

A. Infringement¹

¹ Defendants bear the burden of proving by a preponderance of the evidence that their use of the STRATAFIDE and PCM products are protected by the safe harbor exemption under 35 U.S.C. § 271(e)(1) ("Safe Harbor Exemption"). Natera, to the extent necessary, will introduce evidence to rebut Defendants' assertion that the use of the STRATAFIDE and PCM products are protected by the Safe Harbor Exemption. Defendants also bear the burden of showing that the disclosure-dedication doctrine allegedly bars application of the doctrine of equivalents for the '172 Asserted Claims. Natera, to the extent necessary, will introduce evidence to rebut Defendants' assertion

1. Whether Natera can prove by a preponderance of the evidence that the use of the cfDNA Accused Products perform each step of the '172 Asserted Claims.

2. Whether Natera can prove by a preponderance of the evidence that Defendants and their customers directly infringe the '172 Asserted Claims by using the cfDNA Accused Products in an infringing manner.

3. Whether Natera can prove by a preponderance of the evidence that Defendants induced customers to infringe the '172 Asserted Claims by encouraging customers to use the cfDNA Accused Products in an infringing manner.

4. Whether Natera can prove by a preponderance of the evidence that Defendants contributed to the infringement of the '172 Asserted Claims by selling the cfDNA Accused Products.

5. Whether Natera can prove by a preponderance of the evidence that the use of the cfDNA Accused Products perform each step of the '220 Asserted Claims.

6. Whether Natera can prove by a preponderance of the evidence that Defendants and their customers directly infringe the '220 Asserted Claims by using the cfDNA Accused Products in an infringing manner.

7. Whether Natera can prove by a preponderance of the evidence that Defendants induced customers to infringe the '220 Asserted Claims by encouraging customers to use the cfDNA Accused Products in an infringing manner.

8. Whether Natera can prove by a preponderance of the evidence that Defendants contributed to the infringement of the '220 Asserted Claims by selling the cfDNA Accused

that the disclosure-dedication rule allegedly bars application of the doctrine of equivalents for the '172 Asserted Claims.

Products.

9. Whether Natera can prove by a preponderance of the evidence that the use of the '708 Accused Products perform each step of the '708 Asserted Claims.

10. Whether Natera can prove by a preponderance of the evidence that Defendants and their customers directly infringe the '708 Asserted Claims by using the '708 Accused Products in an infringing manner.

11. Whether Natera can prove by a preponderance of the evidence that Defendants induced customers to infringe the '708 Asserted Claims by encouraging customers to use the '708 Accused Products in an infringing manner.

12. Whether Natera can prove by a preponderance of the evidence that Defendants contributed to the infringement of the '708 Asserted Claims by selling the '708 Accused Products.

B. Remedies²

13. The amount of damages in lost profits that Natera is owed from Defendants due to Defendants' infringement of one or more of the Asserted Claims of the Patents-In-Suit through the date of the verdict.

14. The amount of damages in reasonable royalties that Natera is owed from Defendants due to Defendants' infringement of one or more of the Asserted Claims of the Patents-In-Suit through the date of the verdict.

15. The amount of damages that Natera is owed from Defendants for sales of products

² Pursuant to Fed. R. Civ. P. 26, Defendants are required to supplement their production of damages-related financial documents. Natera requested supplementation of such documents through December 31, 2022 by March 31, 2023. Natera has not yet received all of Defendants' supplemental financial information.. Natera reserves the right to update its damages calculations in light of Defendants' supplementation of this production, and seeks an accounting for damages incurred between the last date for which Defendants have provided adequate financial supplementation through the date of the verdict.

to customers located outside of the United States.

16. Whether Natera is entitled to a permanent injunction, enjoining Defendants and their officers, directors, employees, agents, servants, affiliates, and/or all persons in active concert or participation with them from continued infringement of the Patents-In-Suit, prior to the expiration of the patents, pursuant to 35 U.S.C. § 283.

17. Whether Natera has established that this is an exceptional case and that it is entitled to an award of attorneys' fees and costs under 35 U.S.C. § 285, and if so, the amount.

18. Whether Natera is entitled to an award of prejudgment and post-judgment interest, and if so, the amounts.

II. RESPONSE TO DEFENDANTS' STATEMENT OF CONTESTED FACTS FOR ISSUES ON WHICH DEFENDANTS BEAR THE BURDEN OF PROOF

A. Validity

19. Whether Defendants can show by clear and convincing evidence that any of the Asserted Claims of the Patents-in-Suit are invalid for failure to satisfy the enablement requirement under 35 U.S.C. § 112.

20. Whether Defendants can show by clear and convincing evidence that any of the Asserted Claims of the Patents-in-Suit are invalid for failure to satisfy the written description requirement under 35 U.S.C. § 112.

21. Whether Defendants can show by clear and convincing evidence that any of the Asserted Claims of the Patents-in-Suit are invalid for failure to satisfy the definiteness requirement under 35 U.S.C. § 112.³

³ Natera objects to Defendants' statement of this issue as a contested fact that remains to be litigated during the jury trial. As stated in Natera's Statement of Additional Matters (Exhibit 15 to the Pretrial Order), the parties do not dispute that satisfaction of Section 112, paragraph 2 is an issue of law to be decided by the Court. *Solomon v. Kimberly-Clark Corp.*, 216 F.3d 1372, 1380

22. Whether Defendants can show by clear and convincing evidence that any of the Asserted Claims of the Patents-in-Suit are invalid for failure to claim what the applicants regarded as their invention under 35 U.S.C. § 112.⁴

23. Whether the '172 and '220 Patents are entitled to claim priority to U.S. Patent Application No. 13/300,235 which was filed on November 18, 2011.

24. Whether the '708 Patent is entitled to claim priority to U.S. Provisional Patent Application No. 61/982,245 which was filed on April 21, 2014.⁵

25. The scope and content of the prior art.

26. Whether pre-AIA or AIA Section 102 and 103 of the Patent Act apply to the Asserted Claims of the '172 and '220 Patents.

27. Whether Defendants can show by clear and convincing evidence that any of the Asserted Claims of the Patents-in-Suit are invalid as anticipated under 35 U.S.C. § 102.

28. Whether Defendants can show by clear and convincing evidence that any of the Asserted Claims of the Patents-in-Suit are invalid as obvious under 35 U.S.C. § 103.

29. Whether the secondary considerations of non-obviousness demonstrate that the Asserted Claims of the Patents-in-Suit would not have been obvious.

(2000) (the “determination of whether a claim complies with section 112, paragraph 2, is ‘drawn from the court’s performance of its duty as the construer of patent claims’”). Natera requests that the Court address and rule on this issue to streamline the triable issues before the jury trial.

⁴ Natera objects to Defendants’ statement of this issue as a contested fact that remains to be litigated during the jury trial. As stated in Natera’s Statement of Additional Matters (Exhibit 15 to the Pretrial Order), the parties do not dispute that satisfaction of Section 112, paragraph 2 is an issue of law to be decided by the Court. *Solomon v. Kimberly-Clark Corp.*, 216 F.3d 1372, 1380 (2000) (the “determination of whether a claim complies with section 112, paragraph 2, is ‘drawn from the court’s performance of its duty as the construer of patent claims’”). Natera requests that the Court address and rule on this issue to streamline the triable issues before the jury trial.

⁵ Natera objects to Defendants’ inclusion of priority date being an issue for the '708 Patent. *See, e.g.*, 2021-10-01 Expert Report of Dr. Gregory M. Cooper Regarding Invalidity, at Section V.

30. Whether Defendants can show by clear and convincing evidence that the Asserted Claims of the '172 and '220 Patents are invalid for allegedly failing to name the proper inventors under 35 U.S.C. § 102(f). Natera objects to Defendants' inclusion of improper inventorship defense under 35 U.S.C. § 102(f) as an intended proof for the jury trial. Correction, not invalidation, is the remedy for inventorship error and that is not an issue for jury trial. Natera, to the extent necessary, will introduce evidence to rebut Defendants' assertion that the Asserted Claims of the '172 and '220 Patents are invalid for failing to name the proper inventors under 35 U.S.C. § 102(f).

B. Enforceability⁶

31. Whether Defendants can show by clear and convincing evidence that the '172 and '220 Patents are unenforceable due to alleged prosecution laches.

32. Whether Defendants can show by clear and convincing evidence that the '172 and '220 Patents are unenforceable due to inequitable conduct for alleged improper inventorship.

33. Whether Defendants can show by clear and convincing evidence that the '220 Patent⁷ is unenforceable due to inequitable conduct for alleged failure to disclose materials to the United States Patent and Trademark Office.

⁶ Natera objects to Defendants' inclusion of equitable defenses as contested facts that remain to be litigated during the jury trial. As stated in the parties' Pretrial Order cover pleading and Natera's Statement of Additional Matters (Exhibit 15 to the Pretrial Order), Natera requests that a separate bench trial be held on all equitable defenses asserted by Defendants. Further, the parties should be precluded from mentioning, introducing or otherwise relying on any evidence, argument or testimony relating to Defendants' equitable defenses during the jury trial because such issues are not relevant and will be prejudicial to the parties.

⁷ Natera objects to Defendants' inclusion of the '172 Patent in their statement of contested facts. Defendants have only asserted alleged inequitable conduct for failure to disclose materials to the United States Patent and Trademark Office with respect to the '220 Patent. See D.I. 441 (Defendants' Opposition to Natera, Inc.'s Motions for Partial Summary Judgment and to Preclude Certain Expert Testimony), at 28-30.

34. Whether Defendants can show by clear and convincing evidence that the '172 and '220 Patents are unenforceable due to alleged unclean hands.

C. Defendants' Alleged Remedies⁸

35. Whether Defendants can prove that this is an exceptional case under 35 U.S.C. § 285.

36. Whether Defendants can prove that they are entitled to attorneys' fees, costs, and litigation expenses.

37. Whether Defendants can prove that they are entitled to any other relief that the Court deems just and proper.

⁸ Defendants bear the burden of proving they are entitled to any alleged remedies, including whether they are entitled to costs and attorneys' fees under 35 U.S.C. § 285. Natera, to the extent necessary, will introduce evidence to rebut Defendants' assertion that they are entitled to any remedies, including whether they are entitled to costs and attorneys' fees under 35 U.S.C. § 285.

EXHIBIT 3

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

NATERA, INC.,)

Plaintiff / Counterclaim-Defendant,)

v.)

C.A. No. 20-125 (GBW)

ARCHERDX, INC., ARCHERDX, LLC and)
INVITAE CORP.,)

Defendants / Counterclaimants.)

EXHIBIT 3

**DEFENDANTS' STATEMENT OF ISSUES OF FACT THAT REMAIN TO BE
LITIGATED**

Exhibit 3

Defendants' Statement of Issues of Fact that Remain to be Litigated

Pursuant to Delaware Local Rule 16.3(c)(4), Defendants ArcherDX, Inc., ArcherDX, LLC and Invitae Corporation (collectively, "Defendants") hereby submit the following statement of issues of fact that remain to be litigated.

This statement is based on the current status of the case and Court's rulings to date. Defendants reserve the right to revise, amend, supplement, or modify the following statement based on any pretrial ruling by the Court and/or to address any additional issues, arguments, evidence, or other developments in the case, including edits to the draft pretrial order, any meet and confers or other negotiations between the parties, pending motions, and similar developments. The following statement of issues of fact is not exhaustive, and Defendants reserve the right to prove any matters identified in the pleadings, interrogatory responses, and/or expert reports. Defendants intend to offer evidence as to the issues of fact and issues of law identified in this Pretrial Order. Defendants further intend to offer evidence to rebut evidence offered by Plaintiff Natera, Inc. ("Natera"). To the extent that Defendants' Statement of Issues of Law that Remain to be Litigated set forth in Exhibit 5 contains issues of fact, those issues are incorporated herein by reference. Should the Court determine that any issue identified below is more appropriately considered an issue of law, Defendants incorporate such issue by reference in Exhibit 5. Defendants do not assume the burden of proof with regard to any of the below-listed issues of fact. Defendants also incorporate by reference its expert reports to identify the issues to be resolved at trial.

I. NON-INFRINGEMENT OF THE NATERA ASSERTED PATENTS

1. Whether Natera has proven by a preponderance of the evidence that the use of the cfDNA Accused Products perform each step of the '172 and '220 Asserted Claims.

Exhibit 3

Defendants' Statement of Issues of Fact that Remain to be Litigated

2. Whether Natera has proven by a preponderance of the evidence that Defendants and their customers directly infringe the '172 and '220 Asserted Claims, either literally or under the doctrine of equivalents, by using the cfDNA Accused Products.

3. Whether the disclosure-dedication doctrine bars application of the doctrine of equivalents for the '172 Asserted Claims.

4. Whether Natera has proven by a preponderance of the evidence that Defendants induced customers to infringe the '172 and '220 Asserted Claims by encouraging customers to use the cfDNA Accused Products.

5. Whether Natera has proven by a preponderance of the evidence that Defendants contributed to the infringement of the '172 and '220 Asserted Claims by selling the cfDNA Accused Products.

6. Whether Defendants have proven by a preponderance of the evidence that the use of any of the cfDNA Accused Products are protected by the safe harbor of 35 U.S.C. § 271(e)(1).

7. Whether Natera has proven by a preponderance of the evidence that the use of the '708 Accused Products perform each step of the '708 Asserted Claims.

8. Whether Natera has proven by a preponderance of the evidence that Defendants and their customers directly infringe the '708 Asserted Claims by using the '708 Accused Products.

9. Whether Natera has proven by a preponderance of the evidence that Defendants induced customers to infringe the '708 Asserted Claims by encouraging customers to use the '708 Accused Products.

10. Whether Natera has proven by a preponderance of the evidence that Defendants contributed to the infringement of the '708 Asserted Claims by selling the '708 Accused Products.

Exhibit 3

Defendants' Statement of Issues of Fact that Remain to be Litigated

11. Whether Defendants have proven by a preponderance of the evidence that the use of any of the '708 Accused Products are protected by the safe harbor of 35 U.S.C. § 271(e)(1).

II. REMEDIES FOR DEFENDANTS' ALLEGED INFRINGEMENT

12. To the extent that the jury finds at least one of the Asserted Claims of the Asserted Patents is valid and infringed, whether Natera is entitled to lost profits.

13. To the extent that the jury finds at least one of the Asserted Claims of the Asserted Patents is valid and infringed, the amount of damages in reasonable royalties that Natera is owed from Defendants through the date of the verdict.

14. To the extent that the jury finds at least one of the Asserted Claims of the Asserted Patents is valid and infringed, whether Natera is entitled to any damages for the practice of the accused methods that take place outside the United States.

15. To the extent that the jury finds at least one of the Asserted Claims of the Asserted Patents is valid and infringed, whether Natera is entitled to a permanent injunction.

16. To the extent that the jury finds at least one of the Asserted Claims of the Asserted Patents is valid and infringed, whether Natera has established that this is an exceptional case and that it is entitled to an award of attorneys' fees and costs under 35 U.S.C. § 285, and if so, the amount.

17. To the extent that the jury finds at least one of the Asserted Claims of the Asserted Patents is valid and infringed, whether Natera is entitled to an award of prejudgment and post-judgment interest, and if so, the amounts.

Defendants' Statement of Issues of Fact that Remain to be Litigated

III. THE NATERA ASSERTED PATENTS ARE INVALID

18. Whether Defendants have proven by clear and convincing evidence that the Asserted Patents are invalid for failure to satisfy the enablement requirement under 35 U.S.C. § 112.

19. Whether Defendants have proven by clear and convincing evidence that the Asserted Patents are invalid for failure to satisfy the written description requirement under 35 U.S.C. § 112.

20. Whether Defendants have proven by clear and convincing evidence that the Asserted Patents are invalid for failure to satisfy the definiteness requirement under 35 U.S.C. § 112.

21. Whether Defendants have proven by clear and convincing evidence that the Asserted Patents are invalid for failure to claim what the Applicant/Inventors regarded as their invention as required under 35 U.S.C. § 112.

22. What is the priority date of the Asserted Claims of the Asserted Patents.

23. What is the scope and content of the prior art.

24. Whether pre-AIA or AIA Sections 102 and 103 of the Patent Act apply to the Asserted Claims of the '172 and '220 Patents.

25. Whether Defendants have proven by clear and convincing evidence that the Asserted Patents are invalid as anticipated in view of the prior art pursuant to 35 U.S.C. § 102.

26. Whether Defendants have proven by clear and convincing evidence that the Asserted Patents are invalid as obvious in view of the prior art and state of the art pursuant to 35 U.S.C. § 103.

Exhibit 3

Defendants' Statement of Issues of Fact that Remain to be Litigated

27. Whether any alleged "secondary considerations" support the non-obviousness of the Asserted Patents, including any alleged nexus to the Asserted Claims of the Asserted Patents.

28. Whether Defendants have proven by clear and convincing evidence that the '172 and '220 Patents are invalid for failing to name the proper inventors under 35 U.S.C. § 102(f).

IV. THE NATERA ASSERTED PATENTS ARE UNENFORCEABLE

29. Whether Defendants have proven by clear and convincing evidence that Natera's delay in filing the applications for the '172 and '220 Patents for approximately eight years after the applications to which they claim priority were filed represents an unreasonable and unexplained delay in prosecution and are therefore unenforceable due to prosecution laches.

30. Whether Defendants have proven by clear and convincing evidence that the '172 and '220 Patents are unenforceable due to inequitable conduct for improper inventorship.

V. DEFENDANTS' REMEDIES

31. Whether Defendants can prove that this is an exceptional case justifying an award of attorneys' fees under 35 U.S.C. § 285, including interest.

32. Whether Defendants are entitled to attorneys' fees, costs, and litigation expenses.

33. Whether Defendants are entitled to any other relief that the Court deems just and proper.

EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NATERA, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 20-125 (GBW)
)	(CONSOLIDATED)
ARCHERDX INC., ARCHERDX LLC, and)	
INVITAE CORPORATION)	
)	
Defendants.		

**EXHIBIT 4: NATERA’S STATEMENT OF ISSUES OF LAW THAT REMAIN TO BE
LITIGATED**

Natera respectfully submits the following issues of law that remain to be litigated. Further details regarding these issues have been explained at length in Natera's pleadings and discovery responses, including in its contentions, interrogatory responses, expert reports, by experts at depositions, and by fact witnesses at depositions, which Natera incorporates by reference. Should the Court determine that any issue identified in this list is more properly considered an issue of fact, it shall be so considered and Natera incorporates such issue into Natera's Statement of Issues of Fact That Remain to be Litigated (Ex. 2 to Proposed Final Pretrial Order). To the extent that Natera's Statement of Issues of Fact That Remain to be Litigated contains issues that the Court deems to be issues of law, those issues are incorporated herein by reference. Natera reserves the right to revise, modify, supplement, or change the issues of law to be litigated in response to subsequent Court rulings and/or Defendants' identification of issues of law and fact to be litigated or any new issues Defendants may raise, or for other good cause. The following statement of issues of law is not exhaustive, and Natera reserves the right to prove any matters identified in the pleadings, and discovery responses, including in its contentions, interrogatory responses, expert reports, by experts at depositions, and by fact witnesses at depositions. Natera further intends to offer evidence to rebut evidence offered by Defendants.

I. ISSUES ON WHICH NATERA BEARS THE BURDEN OF PROOF

A. Infringement

As set forth in Natera's Statement of Intended Proofs (Exhibit 13 to the Proposed Pretrial Order), which is incorporated herein by reference, Natera intends to prove by a preponderance of the evidence that the Accused Products infringe the Asserted Claims of the Patents-in-Suit.

A patent is infringed when a person "without authority makes, uses, offers to sell, or sells any patented invention, within the United States or imports into the United States any patented

invention during the term of the patent therefor.” 35 U.S.C. § 271(a). A patentee bears the burden of proving infringement by a preponderance of the evidence, *i.e.*, that it is more likely than not, that an accused product embodies all limitations of the claim either literally or under the doctrine of equivalents. *Warner-Lambert Co. v. Teva Pharms. USA, Inc.*, 418 F.3d 1326, 1341 n.15 (Fed. Cir. 2005); *Nuance Commc’ns Inc. v. Tellme Networks Inc.*, 707 F. Supp. 2d 472, 481 (D. Del. 2010). Infringement, whether literal or under the doctrine of equivalents, is a question of fact. *Sunovion Pharms., Inc. v. Teva Pharms. USA, Inc.*, 731 F.3d 1271, 1275 (Fed. Cir. 2013); *Hilgraeve Corp. v. Symantec Corp.*, 265 F.3d 1336, 1341 (Fed. Cir. 2001).

“A patentee may prove infringement by any method of analysis that is probative of the fact of infringement, and circumstantial evidence may be sufficient.” *Martek BioSciences Corp. v. Nutrinova, Inc.*, 579 F.3d 1363, 1372 (Fed. Cir. 2009) (internal citations and quotations omitted); *Liquid Dynamics Corp. v. Vaughan Co., Inc.*, 449 F.3d 1209, 1219 (Fed. Cir. 2006) (“A patentee may prove direct infringement or inducement of infringement by either direct or circumstantial evidence.” (citation omitted)).

1. Direct Infringement Under 35 U.S.C. § 271

To prove direct infringement of a claim in a patent, a patentee must show that an accused product meets every limitation of the claim, either literally or under the doctrine of equivalents. *Pfizer, Inc. v. Teva Pharms., USA, Inc.*, 429 F.3d 1364, 1376 (Fed. Cir. 2005). A two-step analysis is applied to determine infringement: first, the Court construes the asserted claims to determine their meaning and scope, and second the fact finder compares the accused product to the properly construed claims. *Nuance Commc’ns*, 707 F. Supp. 2d at 480-481.

Infringement under the doctrine of equivalents may be found where an accused product performs substantially the same function in substantially the same way to obtain the same result.

Brilliant Instruments, Inc. v. GuideTech, LLC, 707 F.3d 1342 (Fed. Cir. 2013); *Warner-Jenkinson Co. v. Hilton Davis Chem. Co.*, 520 U.S. 17, 28 (1997); *Graver Tank & Mfg. Co. v. Linde Air Products Co.*, 339 U.S. 605 (1950). “A claim element is equivalently present in an accused device if only ‘insubstantial differences’ distinguish the missing claim element from the corresponding aspects of the accused device.” *Sage Prods Inc. v. Devon Indus.*, 126 F.3d 1420, 1423 (Fed. Cir. 1997). Whether a difference is “insubstantial” is evaluated from the perspective of the POSA and depends on the context of the patent, the prior art, and the particular circumstances of the case. *Brilliant Instruments, Inc.*, 707 F.3d at 1347-48. “Equivalence . . . does not require complete identity for every purpose and in every respect.” *Warner-Jenkinson Co.*, 520 U.S. at 24-25 (internal quotation marks omitted). Known interchangeability of a claim element and the proposed equivalent is a factor that can support a finding of infringement under the doctrine of equivalents. *Id.* at 36 (“The known interchangeability of substitutes for an element of a patent is one of the express objective factors . . . bearing upon whether the accused device is substantially the same as the patented invention.”). In order for the structure or action to be considered interchangeable, the claim element must have been known at the time of the alleged infringement to a person having ordinary skill in the field of technology of the patent. *Id.* at 37.

“Infringement, literal or by equivalence, is determined by comparing an accused product not with a preferred embodiment described in the specification, or with a commercialized embodiment of the patentee, but with the properly and previously construed claims in suit.” *SRI Int’l v. Matsushita Elec. Corp. of Am.*, 775 F.2d 1107, 1121 (Fed. Cir. 1985). “[I]t is error for a court to compare in its infringement analysis the accused product or process with the patentee’s commercial embodiment or other version of the product or process; the only proper comparison is with the claims of the patent.” *Zenith Labs. Inc. v. Bristol-Myers Squibb Co.*, 19 F.3d 1418, 1423

(Fed. Cir. 1994); *see also ACCO Brands, Inc. v. Micro Sec. Devices, Inc.*, 346 F.3d 1075, 1081-82 (Fed. Cir. 2003) (“The language of the claim, not the patent owner’s commercial product, is the measure of infringement.”).

Infringement occurs even when an accused device incorporates additional unclaimed elements. *Stiftung v. Renishaw PLC*, 945 F.2d 1173, 1178 (Fed. Cir. 1991) (“It is fundamental that one cannot avoid infringement merely by adding elements if each element recited in the claims is found in the accused device.”) (quoting *A.B. Dick Co. v. Burroughs Corp.*, 713 F.2d 700, 703 (Fed. Cir. 1983)); *see also Amstar Corp. v. Envirotech Corp.*, 730 F.2d 1476, 1482 (Fed. Cir. 1984) (“An accused device cannot escape infringement by merely adding features, if it otherwise has adopted the basic features of the patent.”) (internal quotation marks omitted).

Literal infringement does not require intent. *Warner-Jenkinson Co.*, 520 U.S. at 35 (“Application of the doctrine of equivalents, therefore, is akin to determining literal infringement, and neither requires proof of intent.”); *Intel Corp. v. United States Int’l Trade Comm’n*, 946 F.2d 821, 832 (Fed. Cir. 1991) (“there is no intent element to *direct* infringement.”).

2. Indirect Infringement Under 35 U.S.C. § 271(b)

35 U.S.C. § 271(b) provides that “[w]hoever actively induces infringement of a patent shall be liable as an infringer.” A party is liable for inducement of infringement under 35 U.S.C. § 271(b) if it is shown that: (1) there has been direct infringement; and (2) the alleged infringer knowingly induced infringement and possessed specific intent to encourage another’s infringement. *Symantec Corp. v. Computer Assocs. Int’l, Inc.*, 522 F.3d 1279, 1292 (Fed. Cir. 2008) (quoting *MEMC Elec. Materials, Inc. v. Mitsubishi Materials Silicon Corp.*, 420 F.3d 1369, 1378 (Fed. Cir. 2005)); *see also DSU Med. Corp. v. JMS Co., Ltd.*, 471 F.3d 1293, 1305–06 (Fed. Cir. 2006) (*en banc*) (finding that inducement requires another party directly infringes the claim;

the party intentionally encourages the acts that constitute direct infringement; and the party knows or should know that its actions will cause direct infringement).

Induced infringement requires proof of actual direct infringement by a third party. *Novartis Pharm. Corp. v. Eon Labs Mfg.*, 363 F.3d 1306, 1308 (Fed. Cir. 2004). “Method claims are only infringed when the claimed process is performed, not by the sale of an apparatus that is capable of infringing use.” *Ormco Corp. v. Align Tech., Inc.*, 463 F.3d 1299, 1311 (Fed. Cir. 2006). “Section 271(b), on inducement, does not contain the ‘substantial noninfringing use’ restriction of section 271(c), on contributory infringement. Thus, a person can be liable for inducing an infringing use of a product even if the product has substantial noninfringing uses.” *Vanda Pharms. Inc. v. West-Ward Pharms. Int’l, Ltd.*, 887 F.3d. 1117, 1133 (internal citations and quotations omitted); *Sanofi v. Glenmark Pharms. Inc., USA*, 204 F. Supp. 3d 665, 681 (D. Del. 2016).

A defendant’s “good-faith” belief regarding patent validity is not a defense to a claim of induced infringement. *Commil USA, LLC v. Cisco Sys., Inc.*, 135 S. Ct. 1920, 1928 (2015). It is irrelevant whether the accused infringer believes that the infringed patent is valid. *Id.* at 1930. “The scienter element for induced infringement concerns infringement; that is a different issue than validity.” *Id.* at 1928.

3. Contributory Infringement Under 35 U.S.C. § 271(c)

Under 35 U.S.C. § 271(c), an accused infringer is liable for contributory infringement if it “offers to sell or sells within the United States or imports into the United States a component of a patented machine, manufacture, combination or composition, or a material or apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in an infringement of such patent, and not a staple article or commodity of commerce suitable for substantial noninfringing use.”

A patentee can prove contributory infringement by showing that: “(1) there is direct infringement; (2) the accused infringer had knowledge of the patent at issue; (3) the component has no substantial noninfringing uses; and (4) the component is a material part of the invention.” *Bone Care Int’l, L.L.C. v. Roxane Labs, Inc.*, No. 09-cv-285-GMS, 2012 WL 2126896, at *10 (D. Del. June 11, 2012) (citing *Fujitsu Ltd. v. Netgear Inc.*, 620 F.3d 1321, 1326 (Fed. Cir. 2010)); *Lucent Techs., Inc. v. Gateway, Inc.*, 580 F.3d 1301, 1320 (Fed. Cir. 2009); 35 U.S.C. § 271(c).

A product is a material component of a composition when it is the sole physical object necessary to practice the method claim. *Braintree Labs, Inc. v. Novel Labs, Inc.*, , No. CIV.A. 11-1341 PGS, 2013 WL 211252, at *13 (D.N.J. Jan. 18, 2013), *vacated and remanded on other grounds*, 749 F.3d 1349 (Fed. Cir. 2014). After a patent owner has made out its prima facie case showing that an accused product is not suitable for substantial non-infringing uses, the burden of production shifts to defendants to prove substantial non-infringing uses. *Golden Blount, Inc. v. Robert H. Peterson Co.*, 438 F.3d 1354, 1363 (Fed. Cir. 2006).

4. 35 U.S.C. § 271(e)(1) – “Safe Harbor”¹

Under 35 U.S.C. § 271(e)(1), “[i]t shall not be an act of infringement to make, use, offer to sell, or sell within the United States or import into the United States a patented invention (other than a new animal drug or veterinary biological product (as those terms are used in the Federal Food, Drug, and Cosmetic Act and the Act of March 4, 1913) which is primarily manufactured using recombinant DNA, recombinant RNA, hybridoma technology, or other processes involving

¹ Defendants bear the burden of proving by a preponderance of the evidence that their use of the STRATAFIDE and PCM products are protected by the safe harbor exemption under 35 U.S.C. § 271(e)(1) (“Safe Harbor Exemption”). Natera, to the extent necessary, will introduce evidence to rebut Defendants’ assertion that the use of the STRATAFIDE and PCM products are protected by the Safe Harbor Exemption.

site specific genetic manipulation techniques) solely for uses reasonably related to the development and submission of information under a Federal law which regulates the manufacture, use, or sale of drugs or veterinary biological products.” Defendants bear the burden of proving by a preponderance of the evidence that the Safe Harbor defense applies.

The Federal Circuit has held that Section 271(e)(1) liability does not attach to infringement if the infringing act was performed “solely for uses reasonably related to the development and submission of information” to the FDA. *Amgen Inc. v. Hospira, Inc.*, 944 F.3d 1327, 1337 (Fed. Cir. 2019). The Safe Harbor Exemption does not apply to all pre-approval activities:

To the extent Hospira suggests that the Safe Harbor exemption always applies in the pre-approval context . . . , we have previously rejected that reading of the statute. It is incorrect to “assume[] that all otherwise infringing activities are exempt if conducted during the period before regulatory approval is granted.”

Amgen, 944 F.3d at 1339, n.2 (quoting *Amgen Inc. v. Int’l Trade Comm’n*, 565 F.3d 846, 852 (Fed. Cir. 2009)). Each of the accused uses must be evaluated separately to determine whether the Safe Harbor applies. *Amgen*, 944 F.3d at 1339. The Safe Harbor also does not apply to a product that is not a “patented invention” for purposes of Section 271(e)(1). *Proveris Scientific Corp. v. Innovasystems, Inc.*, 536 F.3d 1256, 2366 (Fed. Cir. 2008) (“because Innova’s OSA device also is not subject to a required FDCA approval process, it does not need the safe harbor protection afforded by 35 U.S.C. § 271(e)(1).”).

5. Disclosure-Dedication Doctrine

The “disclosure-dedication rule is only triggered when the patentee ‘declines to claim subject matter’ that is disclosed in the written description.” *Guardant Health, Inc. v. Found. Med., Inc.*, Nos. 17-1616 & 17-1623, D.I. 437 at *24 (D. Del. May 7, 2020); *Viiv Healthcare Co. v. Gilead Scis., Inc.*, No. 18-224-CFC, 2020 WL 567398, at *3 (D. Del. Feb. 5, 2020). The disclosure-

dedication rule only applies to embodiments that are clearly disclosed as an alternative to the claimed subject matter but left unclaimed. *See, e.g., Eli Lilly & Co. v. Hospira, Inc.*, 933 F.3d 1320, 1334 (Fed. Cir. 2019).

“The disclosure must be clear and precise.” *Sun Pharm Indus. Ltd. v Saptalis Pharms., LLC*, NO. 18-cv-648, D.I. 146, at *22 (D. Del. Aug. 19, 2019) (“Merely disclosing, in generic terms, alternative formulations that contain a sweetener and a taste-masking agent, but that exclude polyhydroxy alcohol, does not amount to the dedication of all metformin formulations containing a sweetener and a taste-masking agent other than a polyhydroxy alcohol”); *F’Real Foods, LLC v. Hamilton Beach Brands, Inc.*, NO. 16-cv-41, 2020 WL 2085692, at *2 (D. Del. Apr. 30, 2020) (“a generic disclosure to the use of a ‘weight to hold the shield and cup in place’ does not dedicate all uses of weights to the public.”). The disclosure-dedication does not encompass any “generic reference” in a written specification; “disclosure must be of such specificity that one of ordinary skill in the art could identify the subject matter that had been disclosed and not claimed.” *SanDisk Corp. v. Kingston Tech. Co., Inc.*, 695 F.3d 1348, 1363 (Fed. Cir. 2012). The “unclaimed subject matter must have been identified by the patentee as an alternative to a claim limitation.” *Pfizer, Inc. v. Teva Pharms. USA, Inc.*, 429 F.3d 1364, 1379 (Fed. Cir. 2005).

B. Remedies

1. Patent Damages

As set forth in Natera’s Statement of Intended Proofs (Exhibit 13 to the Proposed Pretrial Order), which is incorporated herein by reference, Natera intends to prove by a preponderance of the evidence that Natera is entitled to damages as a result of Defendants’ infringement of the ’172, ’708, and ’220 Patents in the form of lost profits, a reasonable royalty, enhanced damages, together with interests and costs as fixed by the Court, under 35 U.S.C. § 284, damages on accused products

used outside the United States, and a permanent injunction. Natera also intends to prove that it is entitled to an award of attorneys' fees under 35 U.S.C. § 285.

35 U.S.C. § 284 provides "[u]pon finding for the claimant the court shall award the claimant damages adequate to compensate for the infringement, but in no event less than a reasonable royalty for the use made of the invention by the infringer, together with interest and costs as fixed by the court."

"[T]he amount of a prevailing party's damages is a finding of fact on which the plaintiff bears the burden of proof by a preponderance of the evidence." *Smithkline Diagnostics, Inc. v. Helena Labs. Corp.*, 926 F.2d 1161, 1164 (Fed. Cir. 1991). The patent statute "imposes no limitation on the types of harm resulting from infringement that the statute will redress. The section's broad language awards damages for any injury as long as it resulted from the infringement." *King Instruments Corp. v. Perego*, 65 F.3d 941, 947 (Fed. Cir. 1995). "The phrase 'damages *adequate to compensate*' means full compensation for 'any damages' [the patent owner] suffered as a result of the infringement." *Grain Processing Corp. v. American Maize-Products Co.*, 185 F.3d 1341, 1349 (Fed. Cir. 1999). "Full compensation includes any foreseeable lost profits the patent owner can prove." *Id.* "[T]he Supreme Court has interpreted [§ 284] to mean that 'adequate' damages should approximate those damages that will *fully compensate* the patentee for infringement." *Rite-Hite Corp. v. Kelley Co., Inc.*, 56 F.3d 1538, 1545 (Fed. Cir. 1995) (citing *General Motors Corp. v. Devex Corp.*, 461 U.S. 648 (1983)).

A patentee need not prove its damages with absolute certainty. *See W.R. Grace & Co.-Conn. v. InterCat, Inc.*, 60 F. Supp. 2d 316, 321 (D. Del. 1999) (citing *Lam, Inc. v. Johns-Manville Corp.*, 718 F.2d 1056, 1065 (Fed. Cir. 1983)). "[I]t will be enough if the evidence show [*sic*] the extent of the damages as a matter of just and reasonable inference, although the result be only

approximate.” *Story Parchment Co. v. Patterson Paper Co.*, 282 U.S. 555, 563 (1931). Moreover, “[a]ny doubt about the correctness [of damages] is resolved against the infringer.” *State Indus., Inc. v. Mor-Flo Indus., Inc.*, 883 F.2d 1573, 1577 (Fed. Cir. 1989); *Lam*, 718 F.2d at 1064; *W.R. Grace*, 60 F. Supp. 2d at 321. “[F]undamental principles of justice require us to throw the risk of any uncertainty upon the wrongdoer instead of upon the injured party.” *Paper Converting Machine Co. v. Magna-Graphics Corp.*, 745 F.2d 11, 22 (Fed. Cir. 1984).

(i) Lost Profits

Natera is entitled to lost profits. “A patentee may seek to recover actual damages, usually, the amount of profits actually lost” *SmithKline Diagnostics, Inc. v. Helena Labs. Corp.*, 926 F.2d 1161, 1164 (Fed. Cir. 1991) (citations omitted). “[T]he amount of a prevailing party’s damages is a finding of fact on which the plaintiff bears the burden of proof by a preponderance of the evidence.” *Id.* The patent owner bears the burden to present evidence sufficient to show a reasonable probability that it would have made the asserted profits absent infringement.” *King Instruments*, 65 F.3d at 952. The Federal Circuit “has prescribed no one particular method by which the patent owner must meet this burden; ‘the methodology of assessing and computing damages is committed to the sound discretion of the district court.’” *Id.* (citation omitted).

“[T]he statutory measure of ‘damages’ is ‘the difference between [the patent owner’s] pecuniary condition after the infringement, and what his condition would have been if the infringement had not occurred.’” *Grain Processing*, 185 F.3d at 1350 (citing *Aro Mfg. Co. v. Convertible Top Replacement Co.*, 377 U.S. 476, 507 (1964) (plurality opinion)). To prove lost profits, a patentee must reconstruct the market to show “likely outcomes with infringement factored out of the economic picture.” *Id.* As the Federal Circuit explained: “Within this framework, trial courts, with this [C]ourt’s approval, consistently permit patentees to present

market reconstruction theories showing all of the ways in which they would have been better off in the ‘but for world,’ and accordingly to recover lost profits in a wide variety of forms In sum, courts have given patentees significant latitude to prove and recover lost profits for a wide variety of foreseeable economic effects of the infringement.” *Id.* (citations omitted).

To recover lost profits based on lost sales, the patent owner has an initial burden to show a reasonable probability that, “but for” the infringement, the patent owner would have made the infringer’s sales. *Crystal Semiconductor Corp. v. Tritech Microelectronics Int’l, Inc.*, 246 F.3d 1336, 1353 (Fed. Cir. 2001); *State Indus.*, 883 F.2d at 1577. The patent owner is not required, however, to negate all possibilities that a purchaser might have bought a different product or might have foregone the purchase altogether. *State Indus.*, 883 F.2d at 1577. Once the patent owner has met its initial burden, “[t]he burden then shifts to the infringer to show that the [‘but for’ claim] is unreasonable for some or all of the lost sales.” *Rite-Hite*, 56 F.3d at 1545. In a two-supplier market, it may be inferred that the patentee would have made the infringer’s sales or charged higher prices but for the competition. *State Indus.*, 883 F.2d at 1573.

One recognized method by which a plaintiff may prove the amount of its lost sales is based on the factors set forth in the *Panduit* test, whereby the plaintiff establishes four *Panduit* factors: (1) demand for the patented product; (2) absence of acceptable non-infringing substitute products; (3) manufacturing and marketing capability to meet the demand; and (4) the amount of the profit that would have been earned. *Panduit Corp. v. Stahl Bros. Fibre Works, Inc.*, 575 F.2d 1152, 1156 (6th Cir. 1978); *Versata Software, Inc. v. SAP Am., Inc.*, 717 F.3d 1255, 1265 (Fed. Cir. 2013); *DePuy Spine, Inc. v. Medtronic Sofamor Danek, Inc.*, 567 F.3d 1314, 1330 (Fed. Cir. 2009). “A showing under *Panduit* permits a court to reasonably infer that the lost profits claimed were in

fact caused by the infringing sales, thus establishing a patentee's prima facie case with respect to 'but for' causation." *Rite-Hite*, 56 F.3d at 1545.

The Federal Circuit has explained with regard to the first *Panduit* factor:

All that the first factor states, and thus requires, is "demand for the patented product." *Panduit*, 575 F.2d at 1156. This factor does not require any allocation of consumer demand among the various limitations recited in a patent claim. Instead, the first *Panduit* factor simply asks whether demand existed for the "patented product," i.e., a product that is "covered by the patent in suit" or that "directly competes with the infringing device."

DePuy Spine, Inc., 567 F.3d at 1330. Commercial success is compelling evidence of demand. *See Gyromat Corp. v. Champion Spark Plug, Co.*, 735 F.2d 549, 552 (Fed. Cir. 1984).

With regard to the second *Panduit* factor, the *Grain Processing* court held:

When an alleged alternative is not on the market during the accounting period, a trial court may reasonably infer that it was not available as a noninfringing substitute at that time The accused infringer then has the burden to overcome this inference by showing that the substitute was available during the accounting period. . . . Mere speculation or conclusory assertions will not suffice to overcome the inference. After all, the infringer chose to produce the infringing, rather than noninfringing, product. Thus, the trial court must proceed with caution in assessing proof of the availability of substitutes not actually sold during the period of infringement. Acceptable substitutes that the infringer proves were available during the accounting period can preclude or limit lost profits; substitutes only theoretically possible will not.

185 F.3d at 1353. "Consumer demand defines the relevant market and relative substitutability among products therein. . . . Important factors shaping demand may include consumers' intended use for the patentee's product, similarity of physical and functional attributes of the patentee's product to alleged competing products, and price." *Id.* at 1355. "While there may be competing devices available in the marketplace, the 'mere existence of a competing device does not make that device an acceptable substitute.'" *Kalman v. Berlyn Corp.*, 914 F.2d 1473, 1484 (Fed. Cir. 1990) (citation omitted). "It is clear that '[a] product lacking the advantages of [the] patented

[device] can hardly be termed a substitute ‘acceptable’ to the customer who wants those advantages.” *Id.* (citing *Panduit*, 575 F.2d at 1162); *Am. Seating Co. v. USSC Group Inc.*, 514 F.3d 1262, 1270 (Fed. Cir. 2008) (“[B]uyers must view the substitute as equivalent to the patented device.”).

“To prove the absence of acceptable, non-infringing alternatives, the patentee may prove either that the potential alternative was not acceptable to potential customers or was not available at the time [of infringement].” *Presidio Components, Inc. v. American Technical Ceramics Corp.*, 875 F.3d 1369, 1380 (Fed. Cir. 2017). Under Federal Circuit case law, investigational therapies that were not approved by the FDA or on sale at the time of infringement, cannot be deemed non-infringing alternatives. *See Siemens Med. Solutions USA v. Saint-Gobain Ceramics & Plastics, Inc.*, 637 F.3d 1269, 1288 (Fed. Cir. 2011) (“[a] substitute need not be on sale at the time of infringement, but if the substitute cannot be commercialized ‘readily,’ then it is not available for purposes of a lost profits determination”) (citing *Micro Chem., Inc. v. Lextron, Inc.*, 318 F.3d 1119, 1123 (Fed. Cir. 2003)); *Grain Processing Corp. v. Am. Maize-Prods. Co.*, 185 F.3d 1341, 1349 (Fed. Cir. 1999) (“to be an acceptable non-infringing substitute, the product or process must have been available *or* on the market at the time of infringement.”) (citations omitted) (emphasis in original).

The patent owner may prove the third *Panduit* factor – capacity – by showing that it had the ability to meet the demand for the quantity of sales that it claims to have lost. *See Fonar Corp. v. Gen. Elec. Co.*, 107 F.3d 1543, 1553 (Fed. Cir. 1997). Capacity may be shown by evidence that the patent owner would have been able to expand to meet the increased demand created by the success of its patented product. *Id.*

Finally, the patent owner may prove the fourth *Panduit* factor – the amount of profits it lost – by reasonably quantifying the incremental profits it would have made from the sales it lost. *See Paper Converting Mach.*, 745 F.2d at 22. Classic computation of lost sales to infringing products applies the patent owner’s profit margin to the revenue the patent owner would have generated based on the number of infringing units the infringer sold. *King Instruments Corp.*, 65 F.3d at 953.

The incremental income approach to the computation of lost profits is well established in the law relating to patent damages. The approach recognizes that it does not cost as much to produce unit N + 1 if the first N (or fewer) units produced already have paid the fixed costs. Thus fixed costs—those costs which do not vary with increases in production, such as management salaries, property taxes, and insurance—are excluded when determining profits.

Paper Converting, 745 F.2d at 22 (internal citations omitted).

The *Panduit* test is an acceptable, though not exclusive, test for determining the availability of lost profits. *See Tate Access Floors, Inc. v. Maxcess Techs., Inc.*, 222 F.3d 958, 971 (Fed. Cir. 2000) (noting that a patent owner may establish lost profits using the *Panduit* approach); *BIC Leisure Prods., Inc. v. Windsurfing Int’l*, 1 F.3d 1214, 1218 (Fed. Cir. 1993).

(ii) Reasonable Royalty

Natera is also entitled to “damages adequate to compensate for the infringement, but in no event less than a reasonable royalty for the use made of the invention by the infringer, together with interest and costs as fixed by the court.” 35 U.S.C. § 284. “The district court must award damages in an amount no less than a reasonable royalty.” *Dow Chem. Co. v. Mee Indust., Inc.*, 341 F.3d 1370, 1381-82 (Fed. Cir. 2003) (citing 35 U.S.C. § 284). In *Crystal Semiconductor*, 246 F.3d at 1354, the Federal Circuit stated:

A patentee receives a reasonable royalty for any of the infringer's sales not included in the lost profit calculation. *Minco, Inc. v. Combustion Eng’g, Inc.*, 95 F.3d 1109,

1119, 40 U.S.P.Q.2d 1001, 1008 (Fed. Cir.1996); *State Indus., Inc. v. Mor-Flo Indus., Inc.*, 883 F.2d 1573, 1577, 12 U.S.P.Q.2d 1026, 1028 (Fed. Cir.1989). Thus, a patentee may obtain lost profit damages for that portion of the infringer's sales for which the patentee can demonstrate "but for" causation and reasonable royalties for any remaining infringing. *King Instruments Corp. v. Perego*, 65 F.3d 941, 952–53, 36 U.S.P.Q.2d 1129, 1137 (Fed. Cir.1995).

The reasonable royalty may be based on a determination of "the royalty upon which the parties would have agreed had they successfully negotiated an agreement just before infringement began" – the "hypothetical negotiation." *Lucent Techs., Inc.*, 580 F.3d at 1324; *Transocean Offshore Deepwater Drilling, Inc. v. Maersk Drilling USA, Inc.*, 699 F.3d 1340, 1357 (Fed. Cir. 2012). "While the Federal Circuit has not prescribed a specific methodology for calculating a reasonable royalty, courts rely upon the fifteen factors set forth in *Georgia-Pacific Corp. v. United States Plywood Corp.*, 318 F. Supp. 1116, 1120 (S.D.N.Y. 1970)." *St. Clair Intellectual Prop. Consultants, Inc. v. Canon, Inc.*, 2004 WL 2213562 (D. Del. Sept. 28, 2004); accord *Lucent Techs., Inc.*, 580 F.3d at 1324. "[I]n conducting the hypothetical negotiation, the Court is permitted to look to events and facts that occurred after the infringement began." *Mobil Oil Corp. v. Amoco Chemicals Corp.*, 915 F. Supp. 1333, 1353 (D. Del. 1994) (citing *Fromson v. W. Litho Plate & Supply Co.*, 853 F.2d 1568, 1575-76 (Fed. Cir. 1988)).

The fifteen factors established in *Georgia-Pacific Corp. v. United States Plywood Corp.* are as follows:

1. The royalties received by the patentee for the licensing of the patent in suit, proving or tending to prove an established royalty,
2. The rates paid by Defendants to license other patents comparable to the Asserted Patents.
3. The nature and scope of the license, as exclusive or non-exclusive, or as restricted or non-restricted in terms of its territory or with respect to whom the manufactured product may be sold.
4. The licensor's established policy and marketing program to maintain its right to exclude others from using the patented invention by not licensing others to

use the invention, or by granting licenses under special conditions designed to preserve that exclusivity.

5. The commercial relationship between the licensor and the licensee, such as whether they are competitors in the same territory in the same line of business.

6. The effect of selling the patented product in promoting other sales of the licensee; the existing value of the invention to the licensor as a generator of sales of its non-patented items; and the extent of such convoyed sales.

7. The duration of the Asserted Patents and the term of the license.

8. The established profitability of the product made under the Asserted Patents; its commercial success; and its popularity.

9. The utility and advantages of the patented invention over the old modes or devices, if any, that had been used for achieving similar results.

10. The nature of the patented invention; the character of the commercial embodiment of it as owned and produced by or for the licensor; and the benefits to those who have used the invention.

11. The extent to which Defendants have made use of the invention; and any evidence that shows the value of that use.

12. The portion of the profit or of the selling price that may be customary in the particular business or in comparable businesses to allow for the use of the invention or analogous inventions.

13. The portion of the profit that arises from the patented invention itself as opposed to profit arising from unpatented features, such as the manufacturing process, business risks, or significant features or improvements added by the accused infringer.

14. The opinion testimony of qualified experts.

15. The amount that a licensor and a licensee would have agreed upon at the time the infringement began if both sides had been reasonably and voluntarily trying to reach an agreement; that is, the amount which a prudent licensee—who desired, as a business proposition, to obtain a license to manufacture and sell a particular article embodying the patented invention—would have been willing to pay as a royalty and yet be able to make a reasonable profit and which amount would have been acceptable by a patentee who was willing to grant a license.

And any other economic factor that a normally prudent businessperson would, under similar circumstances, take into consideration in negotiating the hypothetical license.

Georgia-Pacific Corp. v. United States Plywood Corp., 318 F. Supp. 1116, 1120 (S.D.N.Y. 1970), mod. and aff'd, 446 F.2d 295 (2d Cir. 1971), cert. denied, 404 U.S. 870 (1971).

If the infringer identifies a non-infringing alternative, said alternative “must have been available or on the market at the time of infringement.” *Grain Processing Corp.*, 185 F.3d at 1349.

For an alternative to be considered available, “there must be evidence that it can be implemented.” *Evolved Wireless, LLC v. Apple Inc.*, 2019 WL 1178517, at *6 (D. Del. March 13, 2019). Substitutes that are only “theoretically possible” are not sufficient alternatives. *LaserDynamics, Inc. v. Quanta Comput., Inc.*, 2011 WL 197869, at *2 (E. D. Tex. Jan. 20, 2011).

“[I]f avoiding the patent would be difficult, expensive, and time-consuming, the amount the infringer would be willing to pay for a license is likely to be greater.” *AstraZeneca AB v. Apotex Corp.*, 782 F.3d 1324, 1334-35 (Fed. Cir. 2015). The court may also consider whether avoiding the patent allowed the defendant to save on costs. *Prism Techs. LLC v. Sprint Spectrum, L.P.*, 849 F.3d 1360, 1376 (Fed. Cir. 2017).

“In determining a reasonable royalty, parties frequently rely on comparable license agreements.” *Bio-Rad Lab’ys, Inc. v. 10X Genomics Inc.*, 967 F.3d 1353, 1372 (Fed. Cir. 2020) (citing *Georgia-Pacific Corp.*, 318 F. Supp. at 1120); *Radio Steel & Mfg. Co. v. MTD Prods., Inc.*, 788 F.2d 1554, 1557 (Fed. Cir. 1986) (“The determination of a reasonabl[e] royalty . . . is based . . . on the royalty to which a willing licensor and a willing licensee would have agreed at the time the infringement began.”). “Assessing the comparability of licenses requires a consideration of whether the license at issue involves comparable technology, is economically comparable, and arises under comparable circumstances as the hypothetical negotiation.” *Bio-Rad Lab’ys, Inc.*, 967 F.3d 1353, 1372-73 (Fed. Cir. 2020).

“Where the licenses employed are sufficiently comparable, this method is typically reliable because the parties are constrained by the market’s actual valuation of the patent.” *Commonwealth Sci. & Indus. Rsch. Organisation v. Cisco Sys., Inc.*, 809 F.3d 1295, 1303 (Fed. Cir. 2015) (concluding that the district court did not violate apportionment principles in employing a damages model that took account of the parties’ informal negotiations with respect to the end product).

Starting “with evidence of proposed royalty rates from the parties’ prior attempts at negotiating a license for the patent” is appropriate as it builds in apportionment “those discussions [] already informally apportioned the proposed license rates to the value of the patented technology.” *Elbit Sys. Land & C4I Ltd. v. Hughes Network Sys., LLC*, 927 F.3d 1292, 1301 (Fed. Cir. 2019) (Because the license agreement “already built in apportionment,” it was sufficient to analyze the asserted patents by adjusting the values of the comparable license for the related patents.).

When a patent claims a novel combination of conventional elements, the proper exercise in assessing damages is not subtracting the value of all conventional elements from the value of the patented invention as a whole; rather, “the question is how much new value is created by the novel combination, beyond the value conferred by the conventional elements alone.” *AstraZeneca AB*, 782 F.3d at 1339 (finding no need to subtract conventional elements in a novel combination).

The combination of the royalty base and royalty rate must reflect the value attributable to the infringing features of the product. *Ericsson, Inc. v. D-Link Sys. Inc.*, 773 F.3d 1201, 1226 (Fed. Cir. 2014).

Even if evidence presented at trial insufficiently supports a party’s specific royalty calculation, “the fact finder is still required to determine what royalty is supported by the record.” *Apple Inc. v. Motorola, Inc.*, 757 F.3d 1286, 1327-28 (Fed. Cir. 2014) (citations omitted) *overruled on other grounds by Williamson v. Citrix Online, LLC*, 792 F.3d 1339 (Fed. Cir. 2015). “The statute is unequivocal that the district court must award damages in an amount no less than a reasonable royalty.” *Dow Chem. Co.*, 341 F.3d at 1381–82 (citing 35 U.S.C. § 284); *see also Del Mar Avionics, Inc. v. Quinton Instrument Co.*, 836 F.2d 1320, 1327 (Fed. Cir. 1987) (“The requirement to determine actual damages is not diminished by difficulty of determination.”). “Indeed, if the record evidence does not fully support either party’s royalty estimate, the fact finder

must still determine what constitutes a reasonable royalty from the record evidence.” *Apple*, 757 F.3d at 1328 (citing *SmithKline Diagnostics*, 926 F.2d at 1167-68) “[T]he factual determination of a reasonable royalty, however, need not be supported, and indeed, frequently is not supported by the specific figures advanced by either party . . . [T]he district court may reject the extreme figures proffered by the litigants as incredible and substitute an intermediate figure as a matter of its judgment from all of the evidence.” *SmithKline Diagnostics*, 926 F.2d at 1167–68.

(iii) Damages on Accused Products Used Outside the United States

Natera may recover damages on Accused Products made and/or sold within the United States and used by customers outside the United States. Where “a physical product is being employed to measure damages for the infringing use of patented methods,” the patentee can recover damages on that physical product, even when the product is used outside of the United States. *Carnegie Mellon University v. Marvell Technology Group*, 807 F.3d 1283, 1305-06 (Fed. Cir. 2015). In *Carnegie*, the Federal Circuit applied a two-step analysis. First, the patentee must establish infringement of the method claims in the United States under § 271(a) with a causal relationship to the accused infringers’ sales. *See id.* at 1294-95; 1306-1308. Second, the patentee must establish that at least one Section 271(a) act—making, using, or selling—occurred within the United States:

What constitutes a territorial connection that brings an action within the reach of a United States statute must ultimately be determined by examining the “‘focus’ of congressional concern” in the particular statute. . . . [W]e think that § 271(a) provides the basis for drawing the needed line. It states a clear definition of what conduct Congress intended to reach—making or using or selling in the United States or importing into the United States, even if one or more of those activities also occur abroad. Where a physical product is being employed to measure damages for the infringing use of patented methods, we conclude, territoriality is satisfied when and only when any one of those domestic actions for that unit (e.g., sale) is proved to be present, even if others of the listed activities for that unit (e.g., making, using) take place abroad. Significantly, once one extends the extraterritoriality

principle to confining how damages are calculated, it makes no sense to insist that the action respecting the product being used for measurement itself be an infringing action.

Id. at 1306; *accord Archerdx, LLC v. QIAGEN Scis., LLC*, No. CV 18-1019 (MN), 2021 WL 3857460, at *2 (D. Del. Aug. 30, 2021).

(iv) Attorneys' Fees

35 U.S.C. § 285 provides for the award of “reasonable attorney fees to the prevailing party” when the case is determined to be exceptional. To be a “prevailing party,” a party “must win a dispute within the case in favor of it that materially alters the legal relationship between the parties at the time of the judgment.” *Parallel Iron LLC v. NetApp Inc.*, 2014 WL 4540209, at *3 (D. Del. Sept. 12, 2014). The Supreme Court has defined an “exceptional” case as “simply one that stands out from others with respect to the substantive strength of a party’s litigating position (considering both the governing law and the facts of the case) or the unreasonable manner in which the case was litigated.” *Octane Fitness, LLC v. ICON Health & Fitness, Inc.*, 134 S. Ct. 1749, 1756 (U.S. 2014). “District courts may determine whether a case is ‘exceptional’ in the case-by-case exercise of their discretion, considering the totality of the circumstances.” *Id.* Relevant factors for consideration include “frivolousness, motivation, objective unreasonableness (both in the factual and legal components of the case) and the need in particular circumstances to advance considerations of compensation and deterrence.” *Id.* at 1756 n.6 (internal quotations marks omitted). *Octane Fitness* rejected the requirement that a litigant establish entitlement to fees under Section 285 by clear and convincing evidence, instead holding that Section 285 “demands a simple discretionary inquiry” that is governed by a “preponderance of the evidence” standard. *Id.* at 1758; *see also Chalumeau Power Systems LLC v. Alcatel-Lucent*, 2014 WL 4675002, at *1 (D. Del. Sept. 12, 2014).

(v) Prejudgment and Post-Judgment Interest

The patent statute authorizes awards of prejudgment interest. 35 U.S.C. § 284. The Supreme Court has held that “prejudgment interest should ordinarily be awarded where necessary to afford the plaintiff full compensation for the infringement.” *General Motors*, 461 U.S. at 564. “An award of prejudgment interest serves to make the patentee whole because the patentee also lost the use of its money due to infringement.” *Crystal Semiconductor*, 246 F.3d at 1361. Prejudgment interest is the rule, not the exception. *General Motors*, 461 U.S. at 655.

“The rate of prejudgment interest and whether it should be compounded or un compounded are matters left largely to the discretion of the district court. . . . In exercising that discretion, however, the district court must be guided by the purpose of prejudgment interest, which is ‘to ensure that the patent owner is placed in as good a position as he would have been had the infringer entered into a reasonable royalty agreement.’” *Bio-Rad Labs, Inc. v. Nicolet Instrument Corp.*, 807 F.2d 964, 969 (Fed. Cir. 1986) (citations omitted).

(vi) Costs

“Federal Rule of Civil Procedure 54(d) gives courts the discretion to award costs to prevailing parties.” *Taniguchi v. Kan Pac. Saipan, Ltd.*, 132 S. Ct. 1997, 2001 (2012). Under Federal Rule 54(d)(1), “[u]nless a federal statute, these rules, or a court order provides otherwise, costs—other than attorney’s fees—should be allowed to the prevailing party.” Fed. R. Civ. P. 54(d)(1) “uses the word ‘costs’ as a term of art, rather than to refer to all expenses a prevailing party may incur in a given action.” *In re Paoli R.R. Yard PCB Litig.*, 221 F.3d 449, 458 (3d Cir. 2000). The categories of costs that are taxable are established by 28 U.S.C. § 1920, which provides for the taxation of the following items as costs: “(1) Fees of the clerk and marshal; (2) Fees for printed or electronically recorded transcripts necessarily obtained for use in the case; (3) Fees and

disbursements for printing and witnesses; (4) Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case; (5) Docket fees under section 1923 of this title; and (6) Compensation of court appointed experts, compensation of interpreters, and salaries, fees, expenses, and costs of special interpretation services under section 1828 of this title.” 28 U.S.C. § 1920.

2. Permanent Injunction

A district court “may grant injunctions in accordance with the principles of equity to prevent the violation of any right secured by patent, on such terms as the court deems reasonable.” 35 U.S.C. § 283. Upon the request of a patentee, the Court may permanently enjoin the infringer, during the life of the patent, from continuing with the activity found to have infringed the patent. *eBay Inc. v. MercExchange, L.L.C.*, 547 U.S. 388 (2006). “[T]he decision whether to grant or deny injunctive relief rests within the equitable discretion of the district courts, and that such discretion must be exercised consistent with traditional principles of equity. . . .” *Id.* at 394. A patentee seeking a permanent injunction must demonstrate each of these factors:

(1) that it has suffered an irreparable injury; (2) that remedies available at law, such as monetary damages, are inadequate to compensate for that injury; (3) that, considering the balance of hardships between the plaintiff and defendant, a remedy in equity is warranted; and (4) that the public interest would not be disserved by a permanent injunction.

Id. at 391.

(i) Evidence of Irreparable Harm

“Price erosion, loss of goodwill, damage to reputation, and loss of business opportunities are all valid grounds for finding irreparable harm.” *Celsis In Vitro, Inc. v. CellzDirect, Inc.*, 664 F.3d 922, 930 (Fed. Cir. 2012) (citations omitted); *see also Douglas Dynamics, LLC v. Buyers Prods. Co.*, 717 F.3d 1336, 1344 (Fed. Cir. 2013) (“Irreparable injury encompasses different types

of losses that are often difficult to quantify, including lost sales and erosion in reputation and brand distinction.”).

Direct competition between the parties strongly supports a finding of irreparable harm. *See Robert Bosch LLC v. Pylon Mfg. Corp.*, 659 F.3d 1142, 1152-54 (Fed. Cir. 2011); *see also Douglas Dynamics, LLC v. Buyers Prods. Co.*, 717 F.3d 1336, 1345 (Fed. Cir. 2013) (“Where two companies are in competition against one another, the patentee suffers the harm—often irreparable—of being forced to compete against products that incorporate and infringe its own patented inventions.”); *Presidio Components v. American Technical Ceramics*, 702 F.3d 1351, 1363 (Fed. Cir. 2012) (“Direct competition in the same market is certainly one factor suggesting strongly the potential for irreparable harm without enforcement of the right to exclude.”); *Broadcom Corp. v. Emulex Corp.*, 732 F.3d 1325, 1338 (Fed. Cir. 2013) (“The district court determined that [Plaintiff] and [Defendant] were competitors and that [Plaintiff] lost market share while [Defendant] gained it—thus [Plaintiff] established irreparable harm.”). This is especially true in a two-supplier market, where “a sale to defendant is the loss of a sale to plaintiff.” *Invista N. Am. S.A.R.L. v. M & G USA Corp.*, 35 F. Supp.3d 598, at 610 (D. Del. 2014) (quoting *TruePosition Inc. v. Andrew Corp.*, 568 F. Supp. 2d 500, 531 (D. Del. 2008)).

(ii) Inadequate Remedies at Law

“[T]he issues of irreparable harm and adequacy of remedies at law are inextricably intertwined,” and courts sometimes analyze the two factors in tandem. *ActiveVideo Networks, Inc. v. Verizon Commc’ns, Inc.*, 694 F.3d 1312, 1337 (Fed. Cir. 2012). Reputational harm and loss of market share are often considered irreparable harms that money damages cannot adequately compensate. *See, e.g., Douglas Dynamics, LLC*, 717 F.3d at 1345 (“This court finds remedies at law inadequate to compensate Douglas for at least the reputation loss Douglas has suffered from

Buyers’s infringement.”); *Broadcom Corp.*, 732 F.3d at 1338 (affirming district court’s finding that money damages were insufficient to compensate for loss of market share in case involving direct competitors). As the Federal Circuit has articulated, “[p]atent property rights are especially difficult to protect with solely monetary relief because a calculating infringer may thus decide to risk a delayed payment to obtain use of valuable property without the owner’s permission.” *Id.* (internal quotation marks omitted).

“Loss of market share, brand recognition, and customer goodwill as the result of the defendant’s infringing acts . . . may frequently defy attempts at valuation, particularly when the infringing acts significantly change the relevant market.” *i4i Ltd. P’ship v. Microsoft Corp.*, 598 F.3d 831, 862 (Fed. Cir. 2010), *aff’d*, 131 S. Ct. 2238 (U.S. 2011). “[A] court may find irreparable injury even if a patentee ‘manages to maintain a profit in the face of infringing competition,’ or experiences an increase in market share following the launch of an infringing product.” *Liqwd, Inc. v. L’Oreal USA, Inc.*, No. CV 17-14-JFB-SRF, 2018 WL 11189619, at *14 (D. Del. Oct. 15, 2018), report and recommendation adopted, No. CV 17-14-JFB-SRF, 2019 WL 1873281 (D. Del. Apr. 26, 2019) (citing *Douglas Dynamics, LLC v. Buyers Prods. Co.*, 717 F.3d 1336, 1344 (Fed. Cir. 2013)). A patentee can also suffer irreparable harm as a result of price pressure from the accused products. *Id.*

(iii) Balance of the Hardships

Under the balance of hardships factor, courts evaluate the “relative effect of granting or denying an injunction on the parties” in view of their sizes, products, and sources of revenue. *i4i Ltd. P’ship*, 598 F.3d at 862. Relative size is not conclusive, and it is within a district court’s discretion to find that the balance of hardships favors an injunction even where it would have a “crippling effect” on the infringer’s business. *Merial Ltd. v. Cipla Ltd.*, 681 F.3d 1283, 1306 (Fed.

Cir. 2012) (affirming entry of permanent injunction). As “[o]ne who elects to build a business on a product found to infringe cannot be heard to complain if an injunction against continuing infringement destroys the business so elected.” *Id.* (citing *Broadcom Corp. v. Qualcomm Inc.*, 543 F.3d 683, 704 (Fed. Cir. 2008)).

(iv) Public Interest

The public interest factor requires a consideration of “whether an injunction, both in scope and effect, strikes a workable balance between protecting the patentee’s rights and protecting the public from the injunction’s adverse effects.” *i4i Ltd. P’ship*, 598 F.3d at 863. The Federal Circuit has recognized a “significant public interest in encouraging investment in drug development and protecting the exclusionary rights conveyed in valid pharmaceutical patents.” *Sanofi-Synthelabo*, 470 F.3d at 1383-84 (internal quotes omitted). The patent laws promote the progress of the pharmaceutical industry “by offering a right of exclusion for a limited period as an incentive to inventors to risk the often enormous costs in terms of time, research, and development.” *Abbott Labs. v. Sandoz, Inc.*, 544 F.3d 1341, 1363 (Fed. Cir. 2008) (quoting *Kewanee Oil Co. v. Bicron Corp.*, 416 U.S. 470, 480 (1974)).

Where reasonably similar alternative treatment options are available, courts have found that the public would not be disserved by an injunction. *See, e.g., Smith & Nephew, Inc. v. Arthrex, Inc.*, 2010 WL 2522428, at *3 (E.D. Tex. June 18, 2010), *vacated on other grounds*, 453 Fed. App’x 977 (Fed. Cir. 2011) (unpublished) (granting injunction despite finding the infringing product “has features that are arguably more advantageous” than the plaintiff’s product); *St. Jude Med., Inc. v. Access Closure, Inc.*, No. 08-CV-4101, slip op. at 8 (W.D. Ark. June 4, 2012) (Dkt. No. 359) (finding that some doctors preferred the infringing vascular closure device but granting injunction because alternative treatments existed for patients with holes in arteries); *Smith &*

Nephew, Inc. v. Synthes (U.S.A.), 466 F. Supp. 2d 978, 985 (W.D. Tenn. 2006) (holding that an injunction “will not negatively affect the public . . . because none of the data on the record establishes undisputed and enormous public reliance on Synthes’ products and because other, similar products are available in the market”); *see also Celsis In Vitro, Inc.*, 664 F.3d at 932 (granting injunction in part because both parties sell the same products and are in direct competition, allowing the public to obtain the products from the party moving for the injunction).

Courts have found that physician or patient preference for the infringing product, without more, is insufficient to find that an injunction would disserve the public interest. *See, e.g., Amgen, Inc. v. F. Hoffman-La Roche Ltd.*, 581 F. Supp. 2d 160, 213 (D. Mass. 2008), *aff’d in part, vacated in part on other grounds*, 580 F.3d 1340 (Fed. Cir. 2009) (“Although doctors and patients would probably benefit from additional choice, it is not clear that MIRCERA offers significant clinical advantages over Aranesp.”); *Schneider (Europe) AG v. SciMed Life Sys., Inc.*, 852 F. Supp. 813, 861 (D. Minn. 1994), *aff’d*, 60 F.3d 839 (Fed. Cir. 1995) (“SOE catheters are generally interchangeable. . . . ‘[M]ere expression of preference’ is not adequate grounds for denying an injunction.”).

Courts also have found that the public will not be harmed by an injunction if the party moving for the injunction can meet the demand that an injunction creates for its product. *See Howes v. Medical Components, Inc.*, 741 F. Supp. 528, 534-535 (E.D. Pa. 1990); *see also Jeneric/Pentron, Inc. v. Dillon Co., Inc.*, 259 F. Supp. 2d 192, 196, (D. Conn. 2003).

II. RESPONSE TO DEFENDANTS’ STATEMENT OF ISSUES OF LAW ON WHICH DEFENDANTS BEAR THE BURDEN OF PROOF²

² Defendants bear the burden of proving they are entitled to any alleged remedies, including whether they are entitled to costs and attorneys’ fees under 35 U.S.C. § 285. *Natera*, to the extent

As set forth in Natera’s Statement of Intended Proofs (Ex. 13 at the Pretrial Order), which is incorporated herein by reference, Defendants will be unable to prove by clear and convincing evidence that, any of Natera’s Asserted Claims are invalid.

A. VALIDITY OF THE PATENTS-IN-SUIT

A defendant challenging the validity of a patent bears the burden of proving invalidity by clear and convincing evidence. *Microsoft Corp. v. i4i Ltd.*, 564 U.S. 91, 95 (2011). “A patent shall be presumed valid.” 35 U.S.C. § 282. A defendant that challenges patent validity “must overcome that presumption to prevail on an invalidity defense,” *Microsoft Corp.*, 564 U.S. at 100 (2011), and a court may conclude that a patent is valid “*solely* on the failure of the patent challenger’s evidence to convincingly establish the contrary.” *Orthokinetics, Inc. v. Safety Travel Chairs, Inc.*, 806 F.2d 1565, 1570 (Fed. Cir. 1986) (emphasis in original).

1. Enablement

Enablement requires that the specification of a patent teach a person skilled in the art how to make and use the claimed invention without undue experimentation. 35 U.S.C. § 112; *In re Wands*, 858 F.2d 731, 736-37 (Fed. Cir. 1988). A patent need not disclose what is well known in the art. *In re Wands*, 858 F.2d at 735. The Federal Circuit has consistently held that “a patent specification complies with the statute even if a ‘reasonable’ amount of routine experimentation is required in order to practice a claimed invention, but that such experimentation must not be ‘undue.’” *Enzo Biochem, Inc. v. Calgene, Inc.*, 188 F.3d 1362, 1371 (Fed. Cir. 1999). The determination of what constitutes undue experimentation in a given case requires the application

necessary, will introduce evidence to rebut Defendants’ assertion that they are entitled to any remedies, including whether they are entitled to costs and attorneys’ fees under 35 U.S.C. § 285.

of a standard of reasonableness, having due regard for the nature of the invention and the state of the art. *In re Wands*, 858 F.2d at 737.

Experimentation that is complex and time-consuming is not necessarily “undue” if it is routine or typical in the pertinent art. *Id.* at 736-37. A “considerable amount of experimentation is permissible, if it is merely routine, or if the specification in question provides a reasonable amount of guidance with respect to the direction in which the experimentation should proceed.” *Id.* at 737. In fact, even “extensive experimentation does not necessarily render the experiments unduly extensive where the experiments involve repetition of known or commonly used techniques.” *Cephalon, Inc. v. Watson Pharms., Inc.*, 707 F.3d 1330, 1338-1339 (Fed. Cir. 2013) (quoting *Johns Hopkins Univ. v. CellPro, Inc.*, 152 F.3d 1342, 1360 (Fed. Cir. 1998)). Moreover, an expert’s unsubstantiated statements that experimentation is undue because it is “complicated” and “difficult” where it involves “repetition of known or commonly used techniques” is not sufficient to prove by clear and convincing evidence that patents are invalid for lack of enablement. *Cephalon*, 707 F.3d at 1338 (court reversed a finding of non-enablement because the amount of experimentation, while “complicated,” was not undue).

It is the “*claimed* invention for which enablement is required. The applicant is not required to include in his application support for matters not set forth in the claim.” *Phillips Petroleum Co. v. U.S. Steel Corp.*, 673 F. Supp. 1278, 1292 (D. Del. 1987) (emphasis in original). Further, the enablement requirement does not require that the patent specification “describe how to make and use every possible variant of the claimed invention.” *AK Steel Corp. v. Sollac & Ugine*, 344 F.3d 1234 (Fed. Cir. 2003). “The enablement requirement is met if the description enables any mode of making and using the invention.” *Johns Hopkins Univ. v. CellPro, Inc.*, 152 F.3d 1342, 1361 (Fed. Cir. 1998).

Determining whether experimentation is “undue” is a factual inquiry based on a balance of the following factors:

1. The breadth of the claims;
2. The nature of the invention;
3. The state of the prior art;
4. The level of one of ordinary skill;
5. The level of predictability in the art;
6. The amount of direction provided by the inventor;
7. The existence of working examples; and
8. The quantity of experimentation needed to make or use the invention based on the content of the disclosure.

In re Wands, 858 F.2d at 737. It is not required that each and every one of these factors be considered when assessing enablement, and depending on the facts, certain *Wands* factors may be more important than others. *Amgen, Inc. v. Chugai Pharm. Co.*, 927 F.2d 1200, 1213 (Fed. Cir. 1991) (noting that the *Wands* factors “are illustrative, not mandatory. What is relevant depends on the facts.”). A patent need not enable technologies or embodiments that constitute new technology arising after the priority date, or that constitute new inventions after the priority date. *Chiron Corp. v. Genentech, Inc.*, 363 F.3d 1247, 1254-1255 (Fed. Cir. 2004); *Amgen Inc. v. Sanofi*, 872 F.3d 1367, 1375 (Fed. Cir. 2017) (citing *In re Hogan*, 559 F.2d 595, 606 (CCPA 1977)); *U.S. Steel Corp. v. Philips Petroleum Co.*, 865 F.2d 1247, 1252 (Fed. Cir. 1989) (a requirement to describe every specific infringing species would “impose an impossible burden on inventors and thus on the patent system.”).

2. Written Description

Pursuant to Section 112(a) of the Patent Act, “[t]he specification shall contain a written description of the invention, and of the manner and process of making and using it, in such full, clear, concise, and exact terms as to enable any person skilled in the art . . . to make and use the same.” 35 U.S.C. § 112(a). To overcome the presumed validity of a patent, a defendant challenging whether a patent meets the written description requirement of 35 U.S.C. § 112(a) “must show that the claims lack a written description by clear and convincing evidence.” *Hynix Semiconductor Inc. v. Rambus Inc.*, 645 F.3d 1336, 1351 (Fed. Cir. 2011).

The written description requirement requires the patent holder to describe its invention with sufficient detail to allow a person of ordinary skill in the art to conclude that “the inventor actually invented the invention claimed.” *Ariad Pharms., Inc. v. Eli Lilly & Co.*, 598 F.3d 1336, 1351 (Fed. Cir. 2010) (*en banc*). The requirement has also been articulated as whether a person of ordinary skill in the art would understand from the disclosure that “the inventor had possession of the claimed subject matter as of the filing date.” *Id.* Because “the hallmark of written description is disclosure,” any test for sufficient written description necessarily “requires an objective inquiry into the four corners of the specification from the perspective of a person of ordinary skill in the art.” *Id.*

The adequacy of the written description is a question of fact. *GlaxoSmithKline LLC v. Banner Pharmacaps, Inc.*, 744 F.3d 725, 729 (Fed. Cir. 2014); *Regents of Univ. of Cal. v. Eli Lilly & Co.*, 119 F.3d 1559, 1566 (Fed. Cir. 1997). Each case involving issues of written description “must be decided on its own facts” and the “precedential value of cases in this area is extremely limited.” *Vas-Cath, Inc. v. Mahurkar*, 935 F.2d 1555, 1562 (Fed. Cir. 1991). This is because no two assessments of written description are alike, and each determination must be made on a case-

by-case basis. *Ariad*, 598 F.3d at 1351; *see also Capon v. Eshhar*, 418 F.3d 1349, 1359 (Fed. Cir. 2005) (“While the Board is correct that a generic invention requires adequate support, the sufficiency of the support must be determined in the particular case”).

It is black letter law that the written “description requirement does not demand any particular form of disclosure.” *Ariad*, 598 F.3d at 1352 (citing *Carnegie Mellon Univ. v. Hoffmann-La Roche Inc.*, 541 F.3d 1115, 1122 (Fed. Cir. 2008)). The level of required disclosure “depends on a variety of factors, such as the existing knowledge in the particular field, the extent and content of the prior art, the maturity of the science or technology, the predictability of the aspect at issue, and other considerations appropriate to the subject matter.” *Capon*, 418 F.3d at 1359.

The law is also “clear that the written description requirement does not demand either examples or an actual reduction to practice; a constructive reduction to practice that in a definite way identifies the claimed invention can satisfy the written description requirement.” *Ariad*, 598 F.3d at 1352. Indeed, “the critical inquiry is whether the patentee has provided a description that in a definite way identifies the claimed invention in sufficient detail that a person of ordinary skill would understand that the inventor was in possession of it.” *Alcon Research, Ltd. v. Barr Labs., Inc.*, 745 F.3d 1180, 1190-91 (Fed. Cir. 2014) (internal quotations omitted).

3. Definiteness³

³ Natera objects to Defendants’ statement of this issue as an issue of law that remains to be litigated during the jury trial. As stated in Natera’s Statement of Additional Matters (Exhibit 15 to the Pretrial Order), the parties do not dispute that satisfaction of Section 112, paragraph 2 is an issue of law to be decided by the Court. *Solomon v. Kimberly-Clark Corp.*, 216 F.3d 1372, 1380 (2000) (the “determination whether a claim complies with section 112, paragraph 2, is ‘drawn from the court’s performance of its duty as the construer of patent claims’”). Natera requests that the Court address and rule on this issue to streamline the triable issues before the jury trial.

Section 112(b) of the Patent Act requires claims to “particularly point[] out and distinctly claim[] the subject matter which the inventor or a joint inventor regards as the invention.” 35 U.S.C. § 112(b). A determination of claim definiteness is a question of law. *Personalized Media Commc’ns, LLC v. Int’l Trade Comm’n*, 161 F.3d 696, 705 (Fed. Cir. 1998). A defendant challenging a patent’s validity has the burden to prove the indefiniteness requirement by clear and convincing evidence. *BSAF Corp. v. Johnson Matthey Inc.*, 875 F.3d 1360, 1365 (Fed. Cir. 2017).

Indefiniteness of a claim is evaluated from the perspective of a person skilled in the relevant art. *See Nautilus, Inc. v. BioSig Instruments, Inc.*, 572 U.S. 898, 908 (2014). Moreover, the claim is evaluated in light of the patent’s specification and prosecution history, and measured as of the time of the patent application. *Id.* Thus, reference to publications or patents in the specification are part of that disclosure, and are included in the inquiry of whether a claim, read in light of the specification and prosecution history, informs “with reasonable certainty” those skilled in the art about the scope of the invention, even if such references are not incorporated by reference. *Atmel Corp. v. Information Storage Devices, Inc.*, 198 F.3d 1374 1383 (Fed. Cir. 1999) (stating that “the district court erred by failing to consider the knowledge of one skilled in the art that indicated, based on unrefuted testimony, that the specification disclosed sufficient structure corresponding to the high-voltage means limitation” by citing, but not describing, a technical article); *see also Eli Lilly & Co. v. Teva Parenteral Medicines Inc.*, 845 F.3d 1357, 1370-72 (Fed. Cir. 2017) (holding the claim term “vitamin B12” as not indefinite when a person of ordinary skill in the art would understand the claim term in the context of the claim language, specification, and prosecution history).

“The claims as granted are accompanied by a presumption of validity based on compliance with, inter alia, § 112 ¶ 2.” *S3 Inc. v. Nvidia Corp.*, 259 F.3d 1364, 1367 (Fed. Cir. 2001). A

patent claim is not indefinite if “viewed in light of the specification and prosecution history,” the claim “inform[s] those skilled in the art about the scope of the invention with reasonable certainty.” *Nautilus*, 572 U.S. at 910. The definiteness requirement is analyzed “not in a vacuum, but always in light of the teachings of the prior art and of the particular application disclosure as it would be interpreted by one possessing the ordinary level of skill in the pertinent art.” *Energizer Holdings v. ITC*, 435 F.3d 1366, 1370 (Fed. Cir. 2006). The definiteness requirement “ensure[s] that patent claims are written in such a way that they give notice to the public of what is claimed, thus enabling [others] to determine whether they infringe.” *Bayer Pharma AG v. Watson Labs., Inc.*, No. 12-1726-LPS, 2014 WL 4954617, at *3 (D. Del. Sept. 30, 2014).

A patent is “invalid for indefiniteness if its claims, read in light of the specification delineating the patent, and the prosecution history, fail to inform, with reasonable certainty, those skilled in the art about the scope of the invention.” *Nautilus, Inc. v. BioSig Instruments, Inc.*, 572 U.S. 898, 901, 909-10 (2014) (also noting that “the definiteness requirement must take into account the inherent limitations of language” as “absolute precision is unattainable.”).

4. Section 112, Paragraph 2, Applicants Claimed What They Regarded as Their Invention⁴

“The determination whether a claim recites ‘the subject matter which the applicant regards as his invention’ . . . ‘is a legal conclusion that is drawn from the court’s performance of its duty

⁴ Natera objects to Defendants’ statement of this issue as an issue of law that remains to be litigated during the jury trial. As stated in Natera’s Statement of Additional Matters (Exhibit 15 to the Pretrial Order), the parties do not dispute that satisfaction of Section 112, paragraph 2 is an issue of law to be decided by the Court. *Solomon v. Kimberly-Clark Corp.*, 216 F.3d 1372, 1380 (2000) (the “determination whether a claim complies with section 112, paragraph 2, is ‘drawn from the court’s performance of its duty as the construer of patent claims’”). Natera requests that the Court address and rule on this issue to streamline the triable issues before the jury trial.

as the construer of patent claims.” *Solomon v. Kimberly-Clark Corp.*, 216 F.3d 1372, 1377 (Fed. Cir. 2000). A patentee is not required to claim every invention disclosed in a single patent. *Cordis Corp. v. Boston Scientific Corp.*, 188 F. App’x 984, 990 (Fed. Cir. 2006) (“We have held that when a patent includes two inventive components, particular claims may be directed to one of those inventive components and not to the other.”)

In order to find indefiniteness based on an applicant’s failure to claim what they regard as their invention there must be “‘an irreconcilable contradiction’ within the patent, i.e., between the patent specification and patent claims, or, relatedly, a ‘logical inconsistency or contradiction’ between the specification and the claims[.]”⁵ *Guard Ant Health, Inc. v. Foundation Medicine, Inc.*, No. 17-1616-LPS-CJB, 2019 WL 5092632, at *4 (D. Del. Oct. 11, 2019) (internal citations omitted); *See also, Enzo Life Scis., Inc. v. Digene Corp.*, 305 F. Supp. 2d 406, 410 (D. Del. 2004) (noting prior precedent “require[s] a finding of invalidity when there is an *irreconcilable contradiction* within the patent.”). “When there is no such contradiction between the specification and relevant claims, the claims are not indefinite” for failing to claim what applicant regards as their invention. *Guard Ant Health, Inc.*, 2019 WL 5092632 at *4.

Further, such contraction cannot be supported by inventor testimony, particularly in the context of litigation. The Federal Circuit has made clear: “inventor testimony, obtained in the

⁵ *See also* MPEP 2172 (“A rejection based on the failure of the claims to set forth the subject matter that the inventor regards as the invention is appropriate only where an inventor has stated, somewhere other than in the application as filed, that the invention is something different from what is defined by the claims.”); § 23:36. Standard, 4 Annotated Patent Digest § 23:36 (“To find this ground of invalidity applicable, an inventor must have stated somewhere in its specification, or perhaps even the prosecution history, that the invention is something different from what is recited in its claims.”) (citing *Allen Engineering Corp. v. Bartell Industries, Inc.*, 299 F.3d 1336, 1349 (Fed. Cir. 2002)).

context of litigation, should not be used to invalidate issued claims under section 112, paragraph 2.” *Solomon*, 216 F.3d at 1380. Courts in this district are in accord. *See, e.g., Lucent Techs., Inc. v. Newbridge Networks Corp.*, 168 F. Supp. 2d 181, 244-47 (D. Del. 2001) (holding testimony that was obtained from an inventor during litigation is irrelevant as matter of law to the § 112, ¶ 2 inquiry); *Minerva Surgical, Inc. v. Hologic, Inc.*, No. CV 18-217-JFB-SRF, 2019 WL 1352808, at *5 (D. Del. Mar. 26, 2019) (recommending inventor’s testimony regarding the definiteness of a claim term should not be given any weight).

5. Priority Date

When a party seeks the benefit of an earlier-filed United States patent application, the earlier application must meet the requirements of 35 U.S.C. § 120 and 35 U.S.C. § 112 ¶ 1, which means the earlier application must contain a written description of the subject matter and must meet the enablement requirement. *See Hyatt v. Boone*, 146 F.3d 1348, 1352 (Fed. Cir. 1998). 35 U.S.C. § 120 allows a later-filed patent application to claim the benefit of an earlier filing date in the United States if “the claims of the later-filed application [are] supported by the written description in the parent ‘in sufficient detail that one skilled in the art can clearly conclude that the inventor invented the claimed invention as of the filing date sought.’” *EnOcean GmbH v. Face Intern. Corp.*, 742 F.3d 955, 960 (Fed. Cir. 2014).

If the party challenging validity comes forward with clear and convincing evidence of invalidating prior art that puts at issue the priority date of any claim of a patent, the burden shifts to the patentee “to come forward with evidence to prove entitlement to claim priority to a filing date that predates the filing date of the patent.” *Fairchild Semiconductor Corp. v. Power Integrations*, 100 F. Supp. 3d 357, 368 (D. Del. 2015) (citing *PowerOasis, Inc. v. T-Mobile USA, Inc.*, 522 F.3d 1299, 1305-06 (Fed. Cir. 2008)). To meet this burden, the patentee must

demonstrate that “the disclosure of the earlier application provides support for the claims of the later application, as required by 35 U.S.C. § 112.” *PowerOasis*, 522 F.3d at 1306 (citing *In re Chu*, 66 F.3d 292, 297 (Fed. Cir. 1995)).

A “prior application need not contain precisely the same words as are found in the asserted claims,” but “the prior application must indicate to a person skilled in the art that the inventor was ‘in possession’ of the invention as later claimed.” *Id.* (citations omitted). “[I]t is unnecessary to spell out every detail of the invention in the specification; only enough must be included to convince a person of skill in the art that the inventor possessed the invention.” *LizardTech Inc. v. Earth Resource Mapping, Inc.*, 424 F.3d 1336, 1345 (Fed. Cir. 2005); *see also Eiselstein v. Frank*, 52 F.3d 1035, 1038 (Fed. Cir. 1995) (“[T]he prior application need not describe the claimed subject matter in exactly the same terms as used in the claims; it must simply indicate to persons skilled in the art that as of the earlier date the applicant had invented what is now claimed.”).

6. Prior Art Under the Pre-AIA and AIA

35 U.S.C. § 102 (pre-AIA) provides that: “A person shall be entitled to a patent unless –
 (a) the invention was known or used by others in this country, or patented or described in a printed publication in this or a foreign country, before the invention thereof by the applicant for patent, or
 (b) the invention was patented or described in a printed publication in this or a foreign country or in public use or on sale in this country, more than one year prior to the date of the application for patent in the United States[.]”

Additionally, even if “the invention is not identically disclosed or described” under section 102, “[a] patent may not be obtained . . . if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at

the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains.” 35 U.S.C. § 103 (pre-AIA).

The AIA modified the law around novelty and non-obviousness and “appl[ies] to any patent application that contains or contained at any time: (1) A claim to a claimed invention that has an effective filing date that is on or after March 16, 2013; or (2) a designation as a continuation, divisional, or continuation-in-part of an application that contains or contained at any time a claim to a claimed invention that has an effective filing date that is on or after March 16, 2013. AIA 35 U.S.C. 102 and 103 also apply to any patent resulting from an application to which AIA 35 U.S.C. 102 and 103 were applied.” 78 Fed. Reg., No. 31, 11072 (Feb. 14, 2013).

35 U.S.C. § 102(a) (AIA) provides that: “A person shall be entitled to a patent unless—(1) the claimed invention was patented, described in a printed publication, or in public use, on sale, or otherwise available to the public before the effective filing date of the claimed invention or (2) the claimed invention was described in a patent issued under section 151, or in an application for patent published or deemed published under section 122(b), in which the patent or application, as the case may be, names another inventor and was effectively filed before the effective filing date of the claimed invention.”

Additionally, 35 U.S.C. § 103 provides that: “A patent for a claimed invention may not be obtained, notwithstanding that the claimed invention is not identically disclosed as set forth in section 102, if the differences between the claimed invention and the prior art are such that the claimed invention as a whole would have been obvious before the effective filing date of the claimed invention to a person having ordinary skill in the art to which the claimed invention pertains. Patentability shall not be negated by the manner in which the invention was made.”

7. Anticipation

A patent claim is invalid if “the claimed invention was patented, described in a printed publication, or in public use, on sale, or otherwise available to the public before the effective filing date of the claimed invention.” 35 U.S.C. § 102(a). In order to show a patent is anticipated, a defendant must demonstrate by clear and convincing evidence that “each and every” element and limitation of the claim was previously described in a single prior art reference, either expressly or inherently. *See Allergan, Inc. v. Apotex Inc.*, 754 F.3d 952, 958 (Fed. Cir. 2014); *Sanofi-Synthelabo v. Apotex, Inc.*, 550 F.3d 1075, 1082 (Fed. Cir. 2008); *see also Microsoft Corp.*, 564 U.S. at 95. Showing that a “prior art reference discloses part of the claimed invention, which an ordinary artisan might supplement to make the whole, or that it includes multiple, distinct teachings that the artisan might somehow combine to achieve the claimed invention” is not enough for anticipation. *Net MoneyIN, Inc. v. VeriSign, Inc.*, 545 F.3d 1359, 1371 (Fed. Cir. 2008).

Further, the anticipating reference must be enabling. *Sanofi-Synthelabo*, 550 F.3d at 1082. “[I]nvalidity by anticipation requires that the four corners of a single, prior art document describe every element of the claimed invention, either expressly or inherently, such that a person of ordinary skill in the art could practice the invention without undue experimentation.” *Advanced Display Sys. Inc. v. Kent State Univ.*, 212 F.3d 1272, 1282 (Fed. Cir. 2000). In trying to show anticipation, “one skilled in the art cannot supply missing elements through his or her knowledge.” *Forest Labs., Inc. v. Ivax Pharms., Inc.*, 438 F. Supp. 2d 479, 485 (D. Del. 2006), *aff’d*, 501 F.3d 1263 (Fed. Cir. 2007). For anticipation, “[t]here must be no difference between the claimed invention and the reference disclosure, as viewed by a person of ordinary skill in the field of the invention.” *Scripps Clinic & Research Found. v. Genentech, Inc.*, 927 F.2d 1565, 1576 (Fed. Cir. 1991), *overruled in part for other reasons by Abbott Labs. v. Sandoz, Inc.*, 566 F.3d 1282 (Fed.

Cir. 2009). A prior-art reference that does not disclose a limitation may inherently anticipate the limitation when the reference must “include the unstated limitation.” *Transclean Corp. v. Bridgewood Servs., Inc.*, 290 F.3d 1364, 1373 (Fed. Cir. 2002). For a reference to be inherently anticipatory, the missing element *must necessarily be present*, not merely “probably or possibly present.” *Trintec Indus. Inc. v. Top-U.S.A. Corp.*, 295 F.3d 1292 (Fed. Cir. 2002) (citing *In re Robertson*, 169 F.3d 743, 745 (Fed. Cir. 1999)). Inherent anticipation cannot “be established by probabilities or possibilities. The mere fact that a certain thing may result from a given set of circumstances is not sufficient.” *Cont’l Can Co. USA v. Monsanto Co.*, 948 F.2d 1264, 1268-69 (Fed. Cir. 1991) (internal quotation marks omitted).

8. Non-Obviousness

Obviousness is a matter of law and depends on the following factual inquiries: (1) the scope and content of the prior art; (2) the differences between the claims and the prior art; (3) the level of ordinary skill in the relevant art; and (4) any objective indicia of nonobviousness. *KSR Int’l Co. v. Teleflex Inc.*, 550 U.S. 398, 406 (2007) (citing *Graham v. John Deere Co.*, 383 U.S. 1, 17 (1966)). 35 U.S.C. § 103 provides the following:

A patent for a claimed invention may not be obtained, notwithstanding that the claimed invention is not identically disclosed as set forth in section 102, if the differences between the claimed invention and the prior art are such that the claimed invention as a whole would have been obvious before the effective filing date of the claimed invention to a person having ordinary skill in the art to which the claimed invention pertains. Patentability shall not be negated by the manner in which the invention was made.

35 U.S.C. § 103. A party seeking to invalidate a patent based on obviousness must demonstrate “by clear and convincing evidence that a skilled artisan would have been motivated to combine the teachings of the prior art references to achieve the claimed invention, and that the skilled artisan would have had a reasonable expectation of success in doing so.” *Pfizer, Inc. v. Apotex, Inc.*, 480

F.3d 1348, 1361 (Fed. Cir. 2007); *see also In re Cyclobenzaprine Hydrochloride Extended-Release Capsule Patent Litig.*, 676 F.3d 1063, 1068-69 (Fed. Cir. 2012). In analyzing obviousness, “a patent composed of several elements is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art.” *KSR Inter. Co.*, 550 U.S. at 418.

Both the suggestion and the reasonable expectation of success “must be founded in the prior art, not in the applicant’s disclosure.” *Noelle v. Lederman*, 355 F.3d 1343, 1352 (Fed. Cir. 2004). “Obviousness requires more than a mere showing that the prior art includes separate references covering each separate limitation in a claim under examination,” *Unigene Labs., Inc. v. Apotex, Inc.*, 655 F.3d 1352, 1360 (Fed. Cir. 2011), and “[a] solution is not obvious simply because it was obvious to conduct experiments to try to solve the problem.” *Vanda Pharms. Inc. v. Roxane Labs., Inc.*, 203 F. Supp. 3d 412, 427 (D. Del. 2016), *aff’d*, 887 F.3d 1117 (Fed. Cir. 2018); *see also Abbott Labs.*, 334 F.3d at 1357.

To avoid “distortion caused by hindsight bias,” there must be “a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does.” *KSR Inter. Co.*, 550 U.S. at 418, 421; *see also id.* at 421 (“A factfinder should be aware, of course, of the distortion caused by hindsight bias and must be cautious of arguments reliant upon ex post reasoning.”); *Novartis Pharms. Corp. v. Par Pharm., Inc.*, 48 F. Supp. 3d 733, 752 (D. Del. 2014) (a party seeking to invalidate a patent claim “must show that a PHOSITA would be motivated to combine the claimed combinations with a reasonable expectation of success.”).

An obviousness determination requires consideration of the objective indicia of nonobviousness (or “secondary considerations”) such as licensing, praise, unexpected results, commercial success, copying, skepticism, failure of others, and long-felt but unresolved need.

KSR, 550 U.S. at 406; *Apple Inc. v. Samsung Elecs. Co., Ltd.*, 839 F.3d 1034, 1048 (Fed. Cir. 2016) (*en banc*) (“Objective indicia of nonobviousness must be considered in every case where present.”). There must also be a nexus between the objective indicia and the claimed invention. *Demaco Corp. v. F. Von Langsdorff Licensing Ltd.*, 851 F.2d 1387, 1392 (Fed. Cir. 1988).

9. Improper Inventorship⁶

“Patent issuance creates a presumption that the named inventors are the true and only inventors.” *Ethicon, Inc. v. U.S. Surgical Corp.*, 135 F.3d 1456, 1460 (Fed. Cir. 1998); *see also Trovan, Ltd. v. Sokymat SA, Irori*, 299 F.3d 1292, 1301 (Fed. Cir. 2002) (“[B]ecause a patent is presumed valid [under] 35 U.S.C. § 282, there follows a presumption that the named inventors on a patent are the true and only inventors.”); *Hess v. Adv. Cardiovascular Sys., Inc.*, 106 F.3d 976, 980 (Fed. Cir. 1997). A party challenging inventorship “must meet the heavy burden of proving its case by clear and convincing evidence.” *Eli Lilly & Co. v. Aradigm Corp.*, 376 F.3d 1352, 1358 (Fed. Cir. 2004); *see also General Elec. Co. v. Wilkins*, 750 F.3d 1324, 1329 (Fed. Cir. 2014) (“Because the issuance of a patent creates a presumption that the named inventors are the true and only inventors, the burden of showing misjoinder or nonjoinder of inventors is a heavy one and must be proved by clear and convincing evidence[.]”); *In re Etter*, 756 F.2d 852, 856 (Fed. Cir. 1985); *Beriont v. GTE Labs. Inc.*, 601 Fed. Appx. 937, 939 (Fed. Cir. 2015) (citing *Hess v. Advanced Cardiovascular Sys. Inc.*, 106 F.3d 976, 980 (Fed. Cir. 1997)). The moving party “must also show that the persons to be removed did not contribute to the invention of any of the allowed

⁶ Natera objects to Defendants’ statement of this issue as an issue of law that remains to be litigated during the jury trial. As stated in Natera’s Statement of Additional Matters (Exhibit 15 to the Pretrial Order), a patent cannot be invalidated if inventorship can be corrected instead. Natera requests that the Court address and rule on Defendants’ Section 102(f) defense to streamline the triable issues before the jury trial.

claims.” *Id.* That clear and convincing evidence must be corroborated. *C.R. Bard, Inc.*, 157 F.3d at 1352 (“An assertion of incorrect inventorship must be based on facts proved by clear and convincing, corroborated evidence.”).

“The ‘inventor,’ in patent law, is the person or persons who conceived the patented invention.” *C.R. Bard, Inc.*, 157 F.3d at 1352. Thus, in order to be considered an inventor, one must contribute to the **conception** of the invention. *Burroughs Wellcome Co. v. Barr Labs., Inc.*, 40 F.3d 1223, 1227-28 (Fed. Cir. 1994). “[T]he test for conception is whether the inventor had an idea that was definite and permanent enough that one skilled in the art could understand the invention.” *Id.* at 1228. A joint inventor’s contribution to the conception of an invention must not be insignificant in quality, when “measured against the dimension of the full invention.” *Eli Lilly & Co.*, 376 F.3d at 1359. “The primary meaning of the word ‘invention’ in the Patent Act unquestionably refers to the inventor’s conception rather than to a physical embodiment of that idea.” *Pfaff v. Wells Electronics, Inc.*, 525 U.S. 55, 60 (1998).

One who simply assists the actual inventor after conception cannot qualify as a joint inventor. *Eli Lilly & Co.*, 376 F.3d at 1359; *see also Hoop v. Hoop*, 279 F.3d 1004, 1007 (Fed. Cir. 2002) (“One may not qualify as a joint inventor, or as here, a new inventor, by ‘merely assisting the actual inventor after conception of the claimed invention.’” (quoting *Ethicon*, 135 F.3d at 1460)); *C.R. Bard*, 157 F.3d at 1352 (“[O]thers may provide services in perfecting the invention conceived by another without becoming an ‘inventor’ by operation of law” (citing *Burroughs Wellcome Co.*, 40 F.3d at 1227-28)).

However, even if the party challenging inventorship is ultimately successful in proving an incorrect inventorship, a patentee may still correct that error in inventorship either upon petition to the Director or upon court order pursuant to 35 U.S.C. § 256. Section 256 was amended in a

significant manner by the America Invents Act and applies to proceedings commenced on or after Sept. 16, 2012 – and thus, would be applicable in the instant litigation with Archer. Section 256 as amended by the AIA, provides as follows (material in [square brackets] was added by AIA and material is {curved brackets} was deleted by AIA:

[(a) Correction.--] Whenever through error a person is named in an issued patent as the inventor, or through error an inventor is not named in an issued patent {and such error arose without any deceptive intention on his part}, the Director may, on application of all the parties and assignees, with proof of the facts and such other requirements as may be imposed, issued a certificate correcting such error.

[(b) Patent valid if error corrected.--] The error of omitting inventors or naming persons who are not inventors shall not invalidate the patent in which such error occurred if it can be corrected as provided in this section. The court before which such matter is called in question may order correction of the patent on notice and hearing of all parties concerned and the Director shall issue a certificate accordingly.

35 U.S.C. § 256 – Correction of Named Inventor.

The Federal Circuit has held that Section 256 and its precedent recognizes that a patent cannot be invalidated if inventorship can be corrected instead. *Egenera, Inc. v. Cisco Systems, Inc.*, 972 F.3d 1367, 1376 (Fed. Cir. 2020) (“The *error* of omitting inventors or naming persons who are not inventors *shall not invalidate the patent* in which such error occurred if it can be corrected as provided in this section.”) (emphasis added). Further, that “error” in Section 256 includes “all varieties of mistakes – honest and dishonest” rather than only unintentional accuracy. *Id.* Even if the error was made with deceptive intention, correction is the appropriate remedy, not invalidation. *Id.* at 1377 (The AIA amended § 256(b) error “does not exclude ‘considered acts,’ or even ‘deceptive intention’ . . . ‘Error’ is simply the incorrect listing of inventors.”). Section 256 is a ‘savings provision’ with no limitations period – inventorship can be corrected at any time and, “[i]f a patentee demonstrates that inventorship can be corrected as provided for in section 256, a

district court must order correction of the patent, thus saving it from being rendered invalid.”

Magnetar Techs. Corp. v. Six Flags Theme Parks Inc., 2017 WL 3279120 at *3 (D. Del. 2017).

“[C]orroboation is required of any witness whose testimony alone is asserted to invalidate a patent, regardless of [their] level of interest.” *Finnigan Corp. v. Int’l Trade Comm’n*, 180 F.3d 1354, 1369 (Fed. Cir. 1999). “[M]isjoinder . . . and non-joinder . . . must be proven by clear and convincing evidence by the party asserting that the inventors . . . are incorrect.” *Horizon Medicines LLC v. Alkem Lab’ys Ltd.*, 503 F. Supp. 3d 118, 127–28 (D. Del. 2020) (citing *Vanderbilt Univ. v. ICOS Corp.*, 601 F.3d 1297, 1305 (Fed. Cir. 2010) (“Our precedent has long required proof of misjoinder or nonjoinder . . . by clear and convincing evidence.”)). And the Federal Circuit has held that “[u]ncorroborated testimony alone cannot constitute [this] clear and convincing proof.” *BJ Servs. Co. v. Halliburton Energy Servs., Inc.*, 338 F.3d 1368, 1373 (2003).

B. UNENFORCEABILITY OF THE PATENTS-IN-SUIT⁷

⁷ Natera objects to Defendants’ inclusion of equitable defenses as issues of law that remain to be litigated during the jury trial. As stated in the parties’ Pretrial Order cover pleading and Natera’s Statement of Additional Matters (Exhibit 15 to the Pretrial Order), Natera requests that a separate bench trial be held on all equitable defenses asserted by Defendants. Further, the parties should be precluded from mentioning, introducing or otherwise relying on any evidence, argument or testimony relating to Defendants’ equitable defenses during the jury trial because such issues are not relevant and will be prejudicial to the parties. Further, Defendants’ suggestion that the Court seek an advisory verdict on the equitable defenses conflict with this districts case law. In fact, courts in this district routinely deny requests for advisory verdicts on equitable issues in patent cases, precisely because of the risk of prejudice and confusion. *See, e.g., CR Bard Inc. v. Angiodynamics Inc.*, C.A. 15-218, Memorandum and Order (D. Del. July 18, 2008) (declining request for advisory verdict on inequitable conduct defense); *Interdigital Commc’ns Inc. v. Nokia Corp.*, C.A. 13-10-RGA, 2014 WL 12465431 (D. Del. Aug. 28, 2014) (holding inequitable conduct is not a matter for the jury to decide); *IOENGINE, LLC v. PayPal Holdings, Inc.*, C.A. 18-452-WCB, 2022 WL 2800911, at *2 (D. Del. June 27, 2022) (granting motion in limine precluding defendants from introducing any evidence related to inequitable conduct to the jury). Instead, courts in this district consistently address equitable issues rather than sending them to a jury trial. *See, e.g., Chrimar Holding Company, LLC v. ALE USA Inc.*, 732 Fed. Appx. 876, 881 (Fed. Cir. 2018) (noting equitable defenses including prosecution laches were left to the court after

1. Prosecution Laches

“[P]rosecution laches requires proving two elements: (a) that the patentee’s delay in prosecution was unreasonable and inexcusable under the totality of circumstances, and (b) that the accused infringer suffered prejudice attributable to the delay.” *Hyatt v. Hirshfeld*, 998 F.3d 1347, 1362 (Fed. Cir. 2021). “[P]rosecution laches may render a patent unenforceable” but only when it has issued “*after an unreasonable and unexplained delay* in prosecution.” *Symbol Techs., Inc. v. Lemelson Med., Educ. & Research Found., L.P.*, 422 F.3d 1378, 1385 (Fed. Cir. 2005)). “[T]here are no strict time limitations for determining whether continued refiling of patent applications is a legitimate utilization of statutory provisions or an abuse of those provisions [and] [t]he matter is to be decided as a matter of equity, subject to the discretion of a district court before which the issue is raised.” *Id.* at 1374-85. “The doctrine should be applied only in egregious cases of misuse of the statutory patent system.” *Id.* at 1385.

Further, the “[d]uration of prosecution [] does not provide a bright-line rule as to the reasonableness of prosecution[.]” *Cordance Corp. v. Amazon.com*, 631 F. Supp. 2d 484, 491 (D. Del. 2009). “The court must look to the prosecution history of the patent family as a whole” such as whether the applicant was prosecuting other applications in the patent family. *Id.* Additionally, the “late claiming” doctrine relates only to whether the patentee “had adequate support in his disclosure, as of its filing date, for the later submitted claims. *Westphal v. Fawzi*, 666 F.2d 575, 577 (C.C.P.A. 1981).

jury trial); *Cancer Rsch. Tech. Ltd. v. Barr Labs., Inc.*, 625 F.3d 724, 727-728 (Fed. Cir. 2010) (“Prosecution laches is an equitable defense to the charge of infringement” and the defense was tried in a bench trial); *Intuitive Surgical, Inc. v. Computer Motion, Inc.*, No. 01–203–SLR, 2002 WL 31833867, *1 (D. Del. Dec. 10, 2002) (parties tried validity and damages issues to a jury and the issue of prosecution laches to the court).

Prosecution laches is an equitable defense for the court and not a jury. *See, e.g., Sprint Communications v. Cox Communications*, No. 12-487-JFB (D. Del. Nov. 20, 2017) (granting motion to exclude evidence of plaintiff’s alleged delay in bringing lawsuit as it was irrelevant and an equitable concern “best presented to the court and not the jury”); *see also Chrimar Holding Company, LLC v. ALE USA Inc.*, 732 Fed. Appx. 876, 881 (Fed. Cir. 2018) (noting equitable defenses including prosecution laches were left to the court after jury trial); *Intuitive Surgical, Inc. v. Computer Motion, Inc.*, No. 01–203–SLR, 2002 WL 31833867, *1 (D. Del. Dec. 10, 2002) (parties tried validity and damages issues to a jury and the issue of prosecution laches to the court).

It is well established law that it is proper to use continuations to later claim a competitor’s invention. *See, e.g., Kingsdown Med. Consultants, Ltd. v. Hollister Inc.*, 863 F.2d 867, 874 (Fed. Cir. 1988) (“[i]t should be made clear ... that there is nothing improper, illegal or inequitable in filing a patent application for the purpose of obtaining a right to exclude a known competitor’s product from the market; nor is it in any manner improper to amend or insert claims intended to cover a competitor’s product the applicant’s attorney has learned about during the prosecution of a patent application.”); *see also Liebel-Flarsheim Co. v. Medrad, Inc.*, 358 F.3d 898, 909 (Fed. Cir. 2004) (recognizing it is not improper for an applicant amend or insert claims during prosecution in order to encompass a competitor’s products, as long as the disclosure supports the claims).

2. Inequitable Conduct

A party claiming inequitable conduct ordinarily must show that the patentee “withheld or misrepresented information that, in the absence of the withholding or misrepresentation, would have prevented a patent claim from issuing.” *Ohio Willow Wood Co. v. Alsp S., LLC*, 735 F.3d 1333, 1345 (Fed. Cir. 2013). Defendants must prove by clear and convincing evidence that the

information was material and the patentee acted with the specific intent to deceive the PTO. *Id.* at 1344. “Intent and materiality are separate requirements. . . . [A] district court may not infer intent solely from materiality. Instead, a court must weigh the evidence of intent to deceive independent of its analysis of materiality.” *Therasense*, 649 F.3d at 1290.

In analyzing the intent requirement, the Federal Circuit has held:

Because direct evidence of deceptive intent is rare, a district court may infer intent from indirect and circumstantial evidence. However, to meet the clear and convincing evidence standard, the specific intent to deceive must be “the single most reasonable inference able to be drawn from the evidence.” Indeed, the evidence “must be sufficient to *require* a finding of deceitful intent in the light of all the circumstances.” Hence, when there are multiple reasonable inferences that may be drawn, intent to deceive cannot be found. *See Scanner Techs. Corp. v. ICOS Vision Sys. Corp.*, 528 F.3d 1365, 1376 (Fed. Cir. 2008) (“Whenever evidence proffered to show either materiality or intent is susceptible of multiple reasonable inferences, a district court clearly errs in overlooking one inference in favor of another equally reasonable inference.”).

Therasense, 649 F.3d at 1290-91 (internal citations omitted) (emphasis in original).

To establish the information is material, the defendant must show by clear and convincing evidence that the patentee “withheld or misrepresented information that, in the absence of the withholding or misrepresentation, would have prevented a patent claim from issuing.” *Id.* at 1345. Even intentional misrepresentations may not rise to the level of inequitable conduct if the “misrepresentation was not the but-for cause of the patent’s issuance.” *See Therasense*, 649 F.3d at 1291 (citing and discussing *Corona Cord Tire Co. v. Dovan Chemical Corp.*, 276 U.S. 358 (1928)).

(i) Inequitable Conduct Based on Improper Inventorship

There is a presumption that “[t]he inventors as named in an issued patent are . . . correct.” *Hess*, 106 F.3d at 980 (quoting *AmaxFly Ash Corp. v. United States*, 514 F.2d 1041, 1047 (1975)).

And “[t]he burden of showing misjoinder or nonjoinder of inventors is a heavy one and must be proved by clear and convincing evidence.” *Id.* (quotation omitted). The clear and convincing evidence necessary to prove nonjoinder requires corroborating contemporaneous evidence of the nonjoined inventor’s contribution to the conception; an inventor’s own testimony alone is insufficient. *Beriont v. GTE Labs. Inc.*, 601 Fed. Appx. 937, 940 (Fed. Cir. 2015).

“The law has long looked with disfavor upon invalidating patents on the basis of mere testimonial evidence absent other evidence that corroborates that testimony.” *Finnigan Corp. v. United States Int’l Trade Comm’n*, 180 F.3d 1354, 1366 (Fed. Cir. 1999). And this rationale requiring corroborating evidence extends to inventorship challenges. *See Ethicon, Inc. v. U.S. Surgical Corp.*, 135 F.3d 1456, 1464 (Fed. Cir. 1998).

Even when an inventorship error exists, such an error “is not by itself inequitable conduct.” *Pro-Mold and Tool Co., Inc. v. Great Lakes Plastics, Inc.*, 75 F.3d 1568, 1576 (Fed. Cir. 1996). “When an alleged omitted co-inventor does not claim to be such, it can hardly be inequitable conduct not to identify that person to the PTO as an inventor.” *Id.*; *see also Cornell Univ. v. Illumina, Inc.*, Case No. 10-433-LPS-MPT, Opinion at 23 (D. Del. Jan. 10, 2017) (citing *Vita-Mix Corp. v. Basic Holding, Inc.*, 581 F.3d 1317, 1332 (Fed. Cir. 2009) (affirming finding of no deceptive intent where inventor “believed the statement to be true at the time that he made it”)).

(ii) Inequitable Conduct Based on Failure to Disclose Materials⁸

⁸ Natera objects to Defendants’ inclusion of the ’814, ’172, and ’482 Patents in their statement of issues of law. Defendants have only asserted alleged inequitable conduct for failure to disclose materials to the United States Patent and Trademark Office with respect to the ’220 Patent. *See* D.I. 441 (Defendants’ Opposition to Natera, Inc.’s Motions for Partial Summary Judgment and to Preclude Certain Expert Testimony), at 28-30.

To establish patent owners engaged in inequitable conduct by failing to disclose materials, Defendants must show by clear and convincing evidence that the patentee “made a deliberate decision to withhold a known material reference.” *Therasense, Inc. v. Becton, Dickinson & Co.*, 649 F.3d 1276, 1290 (Fed. Cir. 2011). “In other words, the accused infringer must prove by clear and convincing evidence that the applicant knew of the reference, knew that it was material, and made a deliberate decision to withhold it.” *Id.*

Therefore, “[t]o prevail on a claim of inequitable conduct, the accused infringer must prove by clear and convincing evidence that the patentee” both “acted with the specific intent to deceive the PTO” and “made a material misrepresentation or omission.” *Belcher Pharms., LLC v. Hospira, Inc.*, 450 F. Supp. 3d 512, 547 (D. Del. 2020), *aff’d*, 11 F.4th 1345 (Fed. Cir. 2021) (citing *Therasense*, 649 F.3d at 1290). Further, “a district court may not infer intent solely from materiality. Instead, a court must weigh the evidence of intent to deceive independent of its analysis of materiality.” *Therasense*, 649 F.3d at 1290.

For materiality, Defendants must show by clear and convincing evidence but-for materiality which requires a showing that the patentee “withheld or misrepresented information that, in the absence of the withholding or misrepresentation, would have prevented a patent claim from issuing.” *Ohio Willow Wood Co. v. Alsp S., LLC*, 735 F.3d 1333, 1345 (Fed. Cir. 2013).

For intent, “to meet the clear and convincing evidence standard, the specific intent to deceive must be ‘the single most reasonable inference able to be drawn from the evidence.’ Indeed, the evidence ‘must be sufficient to require a finding of deceitful intent in the light of all the circumstances.’ Hence, when there are multiple reasonable inferences that may be drawn, intent to deceive cannot be found. *Therasense*, 649 F.3d at 1290-91.

Moreover, “an applicant can not be guilty of inequitable conduct if the reference was cited to the examiner, whether or not it was a ground of rejection by the examiner.” *Fiskars, Inc. v. Hunt Mfg. Co.*, 221 F.3d 1318, 1327 (Fed. Cir. 2000). This is because where the examiner has the allegedly material reference, he or she is “free to credit or discount [the applicant’s] characterizations of [the prior art] in view of their own readings.” *Collectis S.A. v. Precision Biosciences*, 883 F. Supp. 2d 526, 535 (D. Del. 2012) (citing MPEP § 716.01(c)).

“One cannot assume that an individual, who [may] generally kn[o]w that a [litigation] existed, also kn[o]w of the specific material information contained in [a] reference [in the litigation].” *Exergen*, 575 F.3d at 1330. Even when a withheld reference is material, simply alleging knowledge of a material reference and the non-disclosure of that reference does not establish specific intent. *Bayer Cropscience AG v. Dow Agrosciences LLC*, No. 1:10-CV-1045, 2012 WL 1253047, at *4- 5 (D. Del. Apr. 12, 2012) (specific intent could not be inferred from allegations that (1) named inventor knew of fact material to prosecution based on an article he co-authored; (2) inventor had duty to disclose fact to PTO; and (3) inventor failed to disclose information); *Exergen Corp. v. Wal-Mart Stores, Inc.*, 575 F.3d 1312, 1328-29 (Fed. Cir. 2009) (intent requires that “a specific individual . . . withheld or misrepresented this information with a specific intent to deceive the PTO.”). An intent to deceive the PTO may not be inferred solely from some level of knowledge of a prior art reference. *Id.* at 1331 (noting that “[t]he mere fact that an applicant disclosed a reference during prosecution of one application, but did not disclose it during prosecution of a related application, is insufficient to meet the threshold level of deceptive intent required to support an allegation of inequitable conduct”).

3. Unclean Hands

Unclean hands is an affirmative defense that closes the courthouse doors to a party that has “conducted [itself] as to shock the moral sensibilities of the judge.” *Honeywell Int’l, Inc. v. Universal Avionics Sys. Corp.*, 398 F. Supp. 2d 305, 310 (D. Del. 2005) (quoting *Gaudiosi v. Mellon*, 269 F.2d 873, 882 (3d Cir. 1959). “[A] determination of unclean hands may be reached when ‘misconduct’ of a party seeking relief ‘has immediate and necessary relation to the equity that he seeks in respect of the matter in litigation,’ i.e., ‘for such violations of conscience as in some measure affect the equitable relations between the parties in respect of something brought before the court.’” *Gilead Scis., Inc. v. Merck & Co.*, 888 F.3d 1231, 1239 (Fed. Cir. 2018).

Defendants must prove unclean hands with convincing evidence of “egregious” misconduct. *Sanofi–Aventis v. Advancis Pharmaceutical Corp.*, 453 F. Supp. 2d 834, 856 (D. Del. 2006); *Citizens Fin. Group, Inc. v. Citizens Nat’l Bank*, 383 F.3d 110, 129 (3d Cir. 2004). The defense of unclean hands relates only to those situations in which a party’s conduct – such as falsification of evidence – is “offensive to the dictates of natural justice.” *Aptix Corp. v. Quickturn Design Sys., Inc.*, 269 F.3d 1369, 1375 (Fed. Cir. 2001).

EXHIBIT 5

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

NATERA, INC.,)	
)	
<i>Plaintiff / Counterclaim-Defendant,</i>)	
)	
v.)	C.A. No. 20-125 (GBW)
)	
ARCHERDX, INC., ARCHERDX, LLC and)	
INVITAE CORP.,)	
)	
<i>Defendants / Counterclaimants.</i>)	
_____)	

EXHIBIT 5

**DEFENDANTS' STATEMENT OF ISSUES OF LAW THAT REMAIN TO BE
LITIGATED**

Exhibit 5

Defendants' Statement of Issues of Law that Remain to be Litigated

Pursuant to Delaware Local Rule 16.3(c)(5), Defendants ArcherDX, Inc., ArcherDX, LLC and Invitae Corporation (collectively, "Defendants") hereby submit the following statement of issues of law that remain to be litigated.

This statement is based on the current status of the case and Court's rulings to date. Defendants reserve the right to revise, amend, supplement, or modify the following statement based on any pretrial ruling by the Court and/or to address any additional issues, arguments, evidence, or other developments in the case, including edits to the draft pretrial order, any meet and confers or other negotiations between the parties, pending motions, and similar developments. The following statement of issues of law is not exhaustive, and Defendants reserve the right to prove any matters identified in the pleadings, interrogatory responses, and/or expert reports. Defendants intend to offer evidence as to the issues of fact and issues of law identified in this Pretrial Order. Defendants further intend to offer evidence to rebut evidence offered by Plaintiff Natera, Inc. ("Natera"). To the extent that Defendants' Statement of Issues of Facts that Remain to be Litigated set forth in Exhibit 3 contains issues of law, those issues are incorporated herein by reference. Should the Court determine that any issue identified below is more appropriately considered an issue of fact, Defendants incorporate such issue by reference in Exhibit 3. Defendants do not assume the burden of proof with regard to any of the below-listed issues of law. Defendants also incorporate by reference its expert reports to identify the issues to be resolved at trial.

I. NON-INFRINGEMENT OF THE ASSERTED PATENTS

A. Infringement

1. Whether Natera has shown by a preponderance of the evidence that the Accused Products infringe the Asserted Claims of the Asserted Patents.

Defendants' Statement of Issues of Law that Remain to be Litigated

2. “[D]irect infringement of a method claim requires a showing that every step of the claimed method has been practiced” and “that each of the claimed steps are performed within the United States.” *Meyer Intell. Properties Ltd. v. Bodum, Inc.*, 690 F.3d 1354, 1366, 1371 (Fed. Cir. 2012). “Method claims are only infringed when the claimed process is performed, not by the sale of an apparatus that is capable of infringing use.” *Ormco Corp. v. Align Tech., Inc.*, 463 F.3d 1299, 1311 (Fed. Cir. 2006); *see also Moba, B.V. v. Diamond Automation, Inc.*, 325 F.3d 1306, 1313 (Fed. Cir. 2003) (“The sale or manufacture of equipment to perform a claimed method is not direct infringement within the meaning of 35 U.S.C. § 271(a).”); *see also Meyer Intell. Properties*, 690 F.3d at 1366 (“where[] the asserted patent claims are method claims, the sale of a product, without more, does not infringe the patent.”); *see also Dodots Licensing Sols. LLC v. Lenovo Holding Co., Inc.*, No. 18-cv-098 (MN), 2018 WL 6629709, at *2 (D. Del. Dec. 19, 2018) (“[T]he law is clear that direct infringement of a method claim requires performance of every claimed step – not merely the manufacture or sale of a device capable of performing those steps.”). “The law is unequivocal that the sale of equipment to perform a process is not a sale of the process within the meaning of section 271(a).” *Joy Techs., Inc. v. Flakt, Inc.*, 6 F.3d 770, 773 (Fed. Cir. 1993).

3. Pursuant to 35 U.S.C. § 271(e)(1), “[i]t shall not be an act of infringement to . . . use . . . or import into the United States a patented invention . . . solely for uses reasonably related to the development and submission of information under a Federal law which regulates the manufacture, use, or sale of drugs.” 35 U.S.C. § 271(e)(1).

4. “Properly construed, § 271(e)(1) leaves adequate space for experimentation and failure on the road to regulatory approval.” *Merck KGaA v. Integra Lifesciences I, Ltd.*, 545 U.S. 193, 207 (2005). “[T]he statutory text makes clear that it provides a wide berth for the use of patented drugs in activities related to the federal regulatory process.” *Id.* at 202. “§ 271(e)(1)’s

Exhibit 5

Defendants' Statement of Issues of Law that Remain to be Litigated

exemption from infringement extends to all uses of patented inventions that are reasonably related to the development and submission of *any* information under the FDCA. This necessarily includes preclinical studies of patented compounds that are appropriate for submission to the FDA in the regulatory process.” *Id.* (emphasis in original) (internal citation omitted). “There is simply no room in the statute for excluding certain information from the exemption on the basis of the phase of research in which it is developed or the particular submission in which it could be included.” *Id.* 35 U.S.C. § 271(e)(1) may cover experiments even if “they were not conducted in conformity with the FDA’s good laboratory practices regulations.” *Id.* at 204.

5. “Congress did not limit § 271(e)(1)’s safe harbor to the development of information for inclusion in a submission to the FDA . . . Rather, it exempted from infringement all uses . . . ‘reasonably related’ to the process of developing information for submission.” *Id.* at 206. To conclude otherwise, fails to “protect research.” *Id.* “For similar reasons, the use of a patented compound in experiments that are not themselves included in a ‘submission of information’ to the FDA does not, standing alone, render the use infringing. The relationship of the use of a patented compound in a particular experiment to the ‘development and submission of information’ to the FDA does not become more attenuated (or less reasonable) simply because the data from that experiment are left out of the submission that is ultimately passed along to the FDA.” *Id.* at 207. “[T]he use of patented compounds in preclinical studies is protected under § 271(e)(1) as long as there is a reasonable basis for believing that the experiments will produce ‘the types of information that are relevant to’” a submission to the FDA. *Id.* at 208 (quoting Brief for United States as Amicus Curiae 23 (emphasis deleted)).

Defendants' Statement of Issues of Law that Remain to be Litigated

B. Direct Infringement

6. Whether Natera has proven by a preponderance of the evidence that Defendants have directly infringed, literally or under the doctrine of equivalents, the Asserted Claims of the Asserted Patents. *See* 35 U.S.C. § 271(a). The “determination of infringement, both literal and under the doctrine of equivalents, is a question of fact.” *Lockheed Martin Corp. v. Space Sys./Loral, Inc.*, 324 F.3d 1308, 1318 (Fed. Cir. 2003); *see also Kilopass Tech. Inc. v. Sidense Corp.*, No. 10-cv-02066-SI, 2012 WL 3545286, at *4 (N.D. Cal. Aug. 16, 2012), *aff'd*, 501 F. App'x 980 (Fed. Cir. 2013) (per curiam).

7. “Literal infringement requires the patentee to prove that the accused device contains each limitation of the asserted claim(s).” *Bayer AG v. Elan Pharm. Research Corp.*, 212 F.3d 1241, 1247 (Fed. Cir. 2000). “If any claim limitation is absent from the accused device, there is no literal infringement as a matter of law.” *Id.*

8. “Under the doctrine of equivalents, ‘a product or process that does not literally infringe upon the express terms of a patent claim may nonetheless be found to infringe if there is ‘equivalence’ between the elements of the accused product or process and the claimed elements of the patented invention.’” *Eagle Pharms. Inc. v. Slayback Pharma LLC*, 958 F.3d 1171, 1175 (Fed. Cir. 2020) (quoting *Warner-Jenkinson Co. v. Hilton Davis Chem. Co.*, 520 U.S. 17, 21, 29 (1997)). “The central question for infringement under the doctrine of equivalents is whether ‘the accused product or process contain[s] elements identical or equivalent to each claimed element of the patented invention.’” *Eagle Pharms.*, 958 F.3d at 1175 (quoting *Warner-Jenkinson*, 520 U.S. at 40). “A finding of infringement under the doctrine of equivalents requires a showing that the difference between the claimed invention and the accused product was insubstantial.” *Stumbo v. Eastman Outdoors, Inc.*, 508 F.3d 1358, 1364 (Fed. Cir. 2007).

Defendants' Statement of Issues of Law that Remain to be Litigated

9. “[T]he doctrine of equivalents is unavailable for subject matter disclosed in a patent but not included in the claims at issue.” *MorphoSys AG v. Janssen Biotech, Inc.*, 358 F. Supp. 3d 354, 362 (D. Del. 2019) (Stark, J.). “The disclosure-dedication doctrine bars application of the doctrine of equivalents. It states that ‘when a patent drafter discloses but declines to claim subject matter, ... this action dedicates the unclaimed subject matter to the public.’ By preventing a patentee from recapturing unclaimed subject matter, the disclosure-dedication doctrine reinforces ‘the primacy of the claims in defining the scope of the patentee’s exclusive right.’” *Eagle Pharms.*, 958 F.3d at 1175 (quoting *Johnson & Johnston Assoc. v. R.E. Servs.*, 285 F.3d 1046, 1054 (Fed. Cir. 2002) (en banc) (internal citation omitted)).

10. “To determine whether the disclosure-dedication doctrine applies in a given case, we ask whether the specification discloses unclaimed subject matter with ‘such specificity that one of ordinary skill in the art could identify the subject matter that had been disclosed and not claimed.’” *Eagle Pharms.*, 958 F.3d at 1175 (quoting *PSC Computer Prod., Inc. v. Foxconn Int’l, Inc.*, 355 F.3d 1353, 1360 (Fed. Cir. 2004)). “If the court concludes that the inventor dedicated an alleged equivalent to the public, the patent owner cannot prevail on its doctrine of equivalents infringement claim based on that equivalent.” *Eagle Pharms.*, 958 F.3d at 1175.

11. “The disclosure-dedication doctrine does not require the specification to disclose the allegedly dedicated subject matter in an embodiment that exactly matches the claimed embodiment.” *Id.* at 1176; *see also CSP Techs., Inc. v. Sud-Chemie AG*, 643 Fed. App’x 953, 958-59 (Fed. Cir. 2016) (disclosure-dedication rule is not “one of form requiring us to identify some language specifically stating that an embodiment is an ‘alternative’”). “Instead, we have held that the disclosure-dedication doctrine requires only that the specification disclose the unclaimed matter ‘as an alternative to the relevant claim limitation.’” *Id.* (quoting *Pfizer, Inc. v. Teva Pharms.*,

Defendants' Statement of Issues of Law that Remain to be Litigated

USA, Inc., 429 F.3d 1364, 1378 (Fed. Cir. 2005)). “The application of the disclosure-dedication doctrine is a question of law.” *Eagle Pharms.*, 958 F.3d at 1177.

12. A later-filed patent may “reinforce[]” the application of the disclosure-decision rule with respect to earlier patents. *See, e.g., CSP Techs.*, 643 F.App’x at 958 (later-filed continuation “reinforces” that disclosure-dedication rule applies to earlier patent because patentee’s decision to claim a feature “in the patent in suit and not to claim it in this continuation patent implies an intent for the two patents to cover different claim scope”); *see also In re Bendamustine Consol. Cases*, No. 13-cv-2046-GMS, 2015 WL 1951399, at *3 (D. Del. Apr. 29, 2015) (“The fact that claims covering the disclosed subject matter were ultimately allowed in another patent has no bearing on whether they were disclaimed in the patent in question.”); *ViiV Healthcare UK Ltd. v. Lupin Ltd.*, 6 F.Supp.3d 461, 473 (D. Del. 2013) (“It would be improper to recapture scope that is absent in the asserted claim, yet present in unasserted claims, under the doctrine of equivalents.”).

C. Induced Infringement

13. Whether Natera has proven by a preponderance of the evidence that Defendants have induced infringement of the Asserted Claims of the Asserted Patents. *See* 35 U.S.C. § 271(b). Induced infringement is an issue of fact for the jury. *Barry v. Medtronic, Inc.*, 914 F.3d 1310, 1334 (Fed. Cir. 2019). Induced infringement requires “an underlying act of direct infringement.” *Linear Tech. Corp.*, 379 F.3d at 1326 (citing *Joy Techs., Inc.*, 6 F.3d at 774)). “Induced infringement under 35 U.S.C. § 271(b) requires proof of underlying direct infringement, as well as proof that (1) ‘the defendant knew of the patent,’ (2) the defendant knew or should have known that ‘the induced acts constitute patent infringement,’ and (3) the defendant ‘possessed specific intent to encourage another’s infringement.’” *Bio-Rad Labs., Inc. v. Int’l Trade Comm’n*, 998 F.3d 1320,

Defendants' Statement of Issues of Law that Remain to be Litigated

1335 (Fed. Cir. 2021) (quoting *Sanofi, LLC v. Watson Labs. Inc.*, 875 F.3d 636, 643-44 (Fed. Cir. 2017)).

D. Contributory Infringement

14. Whether Natera has proven by a preponderance of the evidence that Defendants have contributorily infringed the Asserted Claims of the Asserted Patents. *See* 35 U.S.C. § 271(c). Contributory infringement requires “an underlying act of direct infringement.” *Linear Tech. Corp. v. Impala Linear Corp.*, 379 F.3d 1311, 1326 (Fed. Cir. 2004) (citing *Joy Techs., Inc.*, 6 F.3d at 774). “Contributory infringement under 35 U.S.C. § 271(c) requires proof that (1) the defendant had ‘knowledge of the patent in suit,’ (2) the defendant had ‘knowledge of patent infringement,’ and (3) the accused product is not a staple article or commodity of commerce suitable for a substantial noninfringing use.” *Bio-Rad Labs.*, 998 F.3d at 1335 (quoting *Commil USA, LLC v. Cisco Sys., Inc.*, 575 U.S. 632, 639 (2015)).

II. NATERA’S REMEDIES

A. Damages

15. If Defendants are found to have infringed a valid claim(s) of the Asserted Patents, whether Natera has shown by preponderance of the evidence that Natera is entitled to damages in the form of lost profits, a reasonable royalty, damages on Accused Products used outside of the United States, attorneys’ fees under 35 U.S.C. § 285, and prejudgment and post-judgment interest. “[T]he patent owner bears the burden of proving by a preponderance of the evidence the quantum of damages, an issue of fact.” *Transclean Corp. v. Bridgewood Servs., Inc.*, 290 F.3d 1364, 1370 (Fed. Cir. 2002).

Exhibit 5

Defendants' Statement of Issues of Law that Remain to be Litigated

1. Lost Profits

16. If Defendants are found to have infringed a valid claim(s) of the Asserted Patents, whether Natera is entitled to damages in the form of lost profits and the amount of such damages. *See Panduit Corp. v. Stahl Bros. Fibre Works, Inc.*, 575 F.2d 1152, 1156 (6th Cir. 1978).

17. “Whether the lost profits at issue are legally compensable is a question of law.” *Rite-Hite Corp. v. Kelley Co.*, 56 F.3d 1538, 1544 (Fed. Cir. 1995).

18. “To recover lost profits as opposed to royalties, a patent owner must prove a causal relation between the infringement and its loss of profits.” *BIC Leisure Prod., Inc. v. Windsurfing Int’l, Inc.*, 1 F.3d 1214, 1218 (Fed. Cir. 1993). “To recover lost profits, the patentee bears the burden of proof to show a ‘reasonable probability that, ‘but for’ infringement, it would have made the sales that were made by the infringer.” *Presidio Components, Inc. v. Am. Tech. Ceramics Corp.*, 875 F.3d 1369, 1380 (Fed. Cir. 2017) (quoting *Crystal Semiconductor Corp. v. TriTech Microelectronics Int’l, Inc.*, 246 F.3d 1336, 1353 (Fed. Cir. 2001)). “An award of lost profits may not be speculative. Rather the patent owner must show a reasonable probability that, absent the infringement, it would have made the infringer’s sales.” *BIC Leisure Prod.*, 1 F.3d at 1218.

19. “‘But-for’ causation can be proven using the test given in *Panduit Corp.*, 575 F.2d at 1152. The four-factor *Panduit* test requires the patentee to show: (1) demand for the patented product; (2) an absence of acceptable, noninfringing substitutes; (3) manufacturing and marketing capability to exploit the demand; and (4) the amount of profit that would have been made.” *Presidio Components*, 875 F.3d at 1380 (internal citation omitted).

Defendants' Statement of Issues of Law that Remain to be Litigated

2. Reasonable Royalty

20. If Defendants are found to have infringed a valid claim(s) of the Asserted Patents, whether Natera is entitled to damages in the form of a reasonable royalty and the amount of such damages.

21. In the event that Defendants are found to have infringed a valid claim(s) of the Asserted Patents, "the court shall award the claimant damages adequate to compensate for the infringement, but in no event less than a reasonable royalty for the use made of the invention by the infringer, together with interest and costs as fixed by the court." 35 U.S.C. § 284.

22. "We have consistently maintained that 'a reasonable royalty analysis requires a court to hypothesize, not to speculate.... [T]he trial court must carefully tie proof of damages to the claimed invention's footprint in the market place.'" *LaserDynamics, Inc. v. Quanta Computer, Inc.*, 694 F.3d 51, 67 (Fed. Cir. 2012) (quoting *ResQNet.com, Inc. v. Lansa, Inc.*, 594 F.3d 860, 869 (Fed. Cir. 2010)). "A damages theory must be based on 'sound economic and factual predicates.'" *LaserDynamics*, 694 F.3d at 67 (quoting *Riles v. Shell Expl. & Prod. Co.*, 298 F.3d 1302, 1311 (Fed. Cir. 2002)).

23. "At all times, the damages inquiry must concentrate on compensation for the economic harm caused by infringement of the claimed invention . . . Any evidence unrelated to the claimed invention does not support compensation for infringement but punishes beyond the reach of the statute." *ResQNet.com, Inc.*, 594 F.3d at 869 (internal citation omitted).

24. "A reasonable royalty is based 'upon a hypothetical royalty resulting from arm's length negotiations between a willing licensor and a willing licensee.'" *St. Clair Intell. Prop. Consultants, Inc. v. Canon, Inc.*, C.A. No. 03-241 JJF, 2004 WL 2213562, at *2 (D. Del. Sept. 28, 2004) (quoting *Hanson v. Alpine Valley Ski Area, Inc.*, 718 F.2d 1075, 1078 (Fed. Cir. 1983)). "In

Defendants' Statement of Issues of Law that Remain to be Litigated

general, the date of the hypothetical negotiation is the date that the infringement began.” *LaserDynamics*, 694 F.3d at 75.

25. “[A] reasonable royalty determination for purposes of making a damages evaluation must relate to the time infringement occurred, and not be an after-the-fact assessment.” *Id.* (quoting *Riles v. Shell Expl. & Prod. Co.*, 298 F.3d at 1313). Thus, the reasonable royalty must be based on facts that existed at the time of the hypothetical infringement.” *Id.* (quoting *Sinclair Ref. Co. v. Jenkins Petroleum Process Co.*, 289 U.S. 689, 698 (1933)).

26. “A comprehensive (but unprioritized and often overlapping) list of relevant factors for a reasonable royalty calculation appears in *Georgia-Pacific Corp. v. United States Plywood Corp.*, 318 F.Supp. 1116, 1120 (S.D.N.Y.1970).” *ResQNet.com, Inc.*, 594 F.3d at 869; see *St. Clair Intell. Prop. Consultants*, 2004 WL 2213562, at *2. “In considering the fifteen *Georgia-Pacific* factors, it is presumed that the parties had full knowledge of the facts and circumstances surrounding the infringement at that time. Indeed, the basic question posed in a hypothetical negotiation is: if, on the eve of infringement, a willing licensor and licensee had entered into an agreement instead of allowing infringement of the patent to take place, what would that agreement be?” *LaserDynamics*, 694 F.3d at 76.

3. Damages on Accused Products Used Outside of the United States

27. If Defendants are found to have infringed a valid claim(s) of the Asserted Patents, whether Natera is entitled to damages for sales of products to customers located outside of the United States when all of the asserted claims are method claims.

28. “It is axiomatic that U.S. patent law does not operate extraterritorially to prohibit infringement abroad.” *Power Integrations, Inc. v. Fairchild Semiconductor Int’l, Inc.*, 711 F.3d 1348, 1371 (Fed. Cir. 2013) (finding patentee is not “entitled to compensatory damages for injury

Defendants' Statement of Issues of Law that Remain to be Litigated

caused by infringing activity that occurred outside the territory of the United States.”). “Our patent laws allow specifically ‘damages adequate to compensate *for the infringement*.’ They do not thereby provide compensation for a defendant’s foreign exploitation of a patented invention, which is not infringement at all.” *Id.* (quoting 35 U.S.C. § 284) (emphasis in original). Patentee “is incorrect that, having established one or more acts of direct infringement in the United States, it may recover damages for [Defendant’s] worldwide sales of the patented invention because those foreign sales were the direct, foreseeable result of [Defendant’s] domestic infringement.” *Id.* “[T]he entirely extraterritorial production, use, or sale of an invention patented in the United States is an independent, intervening act that, under almost all circumstances, cuts off the chain of causation initiated by an act of domestic infringement.” *Id.* at 1371-72.

29. “The Supreme Court has confirmed that the patent laws, like other laws, are to be understood against a background presumption against extraterritorial reach. The background principle applies not just to identifying the conduct that will be deemed infringing but also to assessing the damages that are to be imposed for domestic liability-creating conduct.” *Carnegie Mellon Univ. v. Marvell Tech. Grp., Ltd.*, 807 F.3d 1283, 1306 (Fed. Cir. 2015) (internal citations omitted). 35 U.S.C. § 271(a) “states a clear definition of what conduct Congress intended to reach—making *or* using *or* selling in the United States *or* importing into the United States, even if one or more of those activities also occur abroad. Where a physical product is being employed to measure damages for the infringing use of patented methods, we conclude, territoriality is satisfied when and only when any one of those domestic actions for that unit (*e.g.*, sale) is proved to be present, even if others of the listed activities for that unit (*e.g.*, making, using) take place abroad.” *Id.* (emphasis in original).

Defendants' Statement of Issues of Law that Remain to be Litigated

30. “In the lost-profits context, this court indicated in *Power Integrations* that, where the direct measure of damages was foreign activity (i.e., making, using, selling outside § 271(a)), it was not enough, given the required strength of the presumption against extraterritoriality, that the damages-measuring foreign activity have been factually caused, in the ordinary sense, by domestic activity constituting infringement under § 271(a). We think that the presumption against extraterritoriality, to be given its due, requires something similar in the present royalty setting. Although all of [Defendant’s] sales are strongly enough tied to its domestic infringement as a causation matter to have been part of the hypothetical-negotiation agreement, that conclusion is not enough to use the sales as a direct measure of the royalty except as to sales that are domestic (where there is no domestic making or using and no importing).” *Id.* at 1307 (internal citation omitted).

4. Attorneys’ Fees

31. If Defendants are found to have infringed a valid claim(s) of the Asserted Patents, whether Natera is entitled to its costs and attorneys’ fees under 35 U.S.C. § 285. “The court in exceptional cases may award reasonable attorney fees to the prevailing party.” 35 U.S.C. § 285. An award of “attorney fees is not automatic, even for the extraordinary case.” *Nat’l Presto Indus., Inc. v. West Bend Co.*, 76 F.3d 1185, 1197 (Fed. Cir. 1996) (affirming denial of attorneys’ fees even though willful infringement was found). Entitlement to attorneys’ fees under 35 U.S.C. § 285 is not automatic, and must be demonstrated by a preponderance of the evidence. *Octane Fitness, LLC v. ICON Health & Fitness, Inc.*, 572 U.S. 545, 557 (2014).

32. The Supreme Court has defined an “exceptional” case as “one that stands out from others with respect to the substantive strength of a party’s litigating position (considering both the governing law and the facts of the case) or the unreasonable manner in which the case was

Defendants' Statement of Issues of Law that Remain to be Litigated

litigated.” *Id.* at 554. The district court “may determine whether a case is ‘exceptional’ in the case-by-case exercise of their discretion, considering the totality of the circumstances.” *Id.*

33. “[A] strong or even correct litigating position is not the standard by which [the court] assess[es] exceptionality.” *Stone Basket Innovations, LLC v. Cook Med. LLC*, 892 F.3d 1175, 1180 (Fed. Cir. 2018). “A party’s position on issues of law ultimately need not be correct for them to not ‘stand[] out,’ or be found reasonable.” *Id.* (quoting *SFA Sys., LLC v. Newegg Inc.*, 793 F.3d 1344, 1348 (Fed. Cir. 2015)).

5. Prejudgment and Post-Judgment Interest

34. If Defendants are found to have infringed a valid claim(s) of the Asserted Patents, whether Natera is entitled to prejudgment and post-judgment interest. *See* 35 U.S.C. § 284; *Gen. Motors Corp. v. Devex Corp.*, 461 U.S. 648 (1983) (pre-judgment interest); *Mathis v. Spears*, 857 F.2d 749, 760 (Fed. Cir. 1988) (post-judgment interest).

B. Permanent Injunction

35. If Defendants are found to have infringed a valid claim(s) of the Asserted Patents, whether Natera is entitled to permanent injunctive relief prohibiting Defendants from further infringement of the Asserted Patents. *See* 35 U.S.C. § 283.

36. As part of the relief from adjudicated infringement, a court upon the request of the patent holder may permanently enjoin the infringer, during the life of the patent, from continuing with the activity found to have infringed the patent. *See eBay Inc. v. MercExchange, L.L.C.*, 547 U.S. 388 (2006). “According to well-established principles of equity, a plaintiff seeking a permanent injunction must satisfy a four-factor test before a court may grant such relief. A plaintiff must demonstrate: (1) that it has suffered an irreparable injury; (2) that remedies available at law, such as monetary damages, are inadequate to compensate for that injury; (3) that, considering the

Defendants' Statement of Issues of Law that Remain to be Litigated

balance of hardships between the plaintiff and defendant, a remedy in equity is warranted; and (4) that the public interest would not be disserved by a permanent injunction.” *Id.* at 391. First, “[t]o prove irreparable injury, ‘a patentee must establish both of the following requirements: 1) that absent an injunction, it will suffer irreparable harm, and 2) that a sufficiently strong causal nexus relates the alleged harm to the alleged infringement.’” *Wonderland Switzerland AG v. Evenflo Co., Inc.*, Case No. 18-cv-1990-RGA, 2022 WL 2438750, at *2 (D. Del. July 5, 2022) (quoting *Apple Inc. v. Samsung Elecs. Co.*, 695 F.3d 1370, 1374 (Fed. Cir. 2012)). Second, “Plaintiff must show that damages are inadequate to compensate for Defendant’s infringement.” *Wonderland Switzerland AG*, 2022 WL 2438750, at *3 (denying plaintiff’s post-trial motion for a permanent injunction). Third, “[i]n considering the balance of hardships, courts may consider the ‘parties’ sizes, products, and revenue sources.’” *Bio-Rad Lab’ys, Inc. v. 10X Genomics Inc.*, 967 F.3d 1353, 1378 (Fed. Cir. 2020) (quoting *i4i Ltd. P’ship v. Microsoft Corp.*, 598 F.3d 831, 862 (Fed. Cir. 2010), *aff’d*, 564 U.S. 91 (2011)). Fourth, “[t]he touchstone of the public interest factor is whether an injunction, both in scope and effect, strikes a workable balance between protecting the patentee’s rights and protecting the public from the injunction’s adverse effects.” *Bio-Rad*, 967 F.3d at 1379 (quoting *i4i*, 598 F.3d at 863, *aff’d*, 564 U.S. 91 (2011)).

III. INVALIDITY OF THE ASSERTED PATENTS

A. Enablement

37. Whether any Asserted Claim of the Asserted Patents is invalid for failure to satisfy the enablement requirement under 35 U.S.C. § 112. *See* 35 U.S.C. § 112. Section 112 of the Patent Act requires not only that the specification describe the invention itself (the written description requirement), but also that the specification describe the “manner and process of making and using” the invention, such that a person skilled in the art may also make and use it (the enablement

Defendants' Statement of Issues of Law that Remain to be Litigated

requirement). *See Ariad Pharms., Inc. v. Eli Lilly & Co.*, 598 F.3d 1336, 1344 (Fed. Cir. 2010); *LizardTech, Inc. v. Earth Res. Mapping, Inc.*, 424 F.3d 1336, 1344-45 (Fed. Cir. 2005). A patent must “enable any person skilled in the art to which it pertains, or with which it is most nearly connected, to make and use” the claimed invention. *See* 35 U.S.C. § 112(a).

38. Enablement is a question of law, but the determination may be based on underlying factual findings. *Alcon Research Ltd. v. Barr Labs., Inc.*, 745 F.3d 1180, 1188 (Fed. Cir. 2014). Enablement is determined as of the date of the allegedly anticipating reference. *See, e.g., Elan Pharms., Inc. v. Mayo Found. for Med. Educ. & Research*, 346 F.3d 1051, 1054 (Fed. Cir. 2003); *In re Omeprazole Patent Litig.*, 490 F. Supp. 2d 381, 510 (S.D.N.Y. 2007) (“An invention is placed in the possession of the public only where 1) the reference describes the claimed invention-the identity of invention requirement-such that 2) a person possessing ordinary skill in the art would have been able to make it as of that time based on his knowledge and the teaching of the publication.”) (internal quotations and citations omitted).

39. The party asserting non-enablement bears the burden of proof by clear and convincing evidence. *See Alcon Research*, 745 F.3d at 1189-90. The patent may be enabling even though it does not expressly state some information if a person of ordinary skill in the field could make and use the invention without having to do excessive experimentation. 35 U.S.C. § 112(a); *Hybritech Inc. v. Monoclonal Antibodies, Inc.*, 802 F.2d 1367, 1384 (Fed. Cir. 1986). A “patent’s specification need not ‘describe how to make and use every possible variant of the claimed invention’” so long as it teaches “those skilled in the art how to make and use the full scope of the claimed invention ‘without undue experimentation.’” *McRO, Inc. v. Bandai Namco Games Am. Inc.*, 959 F.3d 1091, 1100 (Fed. Cir. 2020) (citations omitted). The standard for undue experimentation is set out in *In re Wands*, 858 F.2d 731 (Fed. Cir. 1988). The court sets out eight

Defendants' Statement of Issues of Law that Remain to be Litigated

factors for determining whether a disclosure requires undue experimentation: (1) the quantity of experimentation necessary; (2) the amount of direction or guidance presented; (3) the presence or absence of working examples; (4) the nature of the invention; (5) the state of the prior art; (6) the relative skill of those in the art; (7) the predictability or unpredictability of the art; and (8) the breadth of the claims. *In re Wands*, 858 F.2d at 737.

40. The enablement “requirement is limited to what is claimed. Section 112 requires enablement of ‘only the claimed invention,’ not matter outside the claims.” *McRO*, 959 F.3d at 1100 (citation omitted); *Application of Geerdes*, 491 F.2d 1260, 1265 (C.C.P.A. 1974) (holding that the patent enabled the scope of the claims and disagreeing with the determination “that the claims are inclusive of materials which would not apparently be operative in the claimed process” because the “use of materials which might prevent achievement of the objective (by rendering the process inoperative) can hardly be said to be within the scope of the claims”). “It is the specification, not the knowledge of one skilled in the art, that must supply the novel aspects of an invention.” *Genentech, Inc. v. Novo Nordisk A/S*, 108 F.3d 1361, 1366 (Fed. Cir. 1997); *McRO*, 959 F.3d at 1100-1102 (“the specification must reasonably teach how to make and use [the novel] aspect of the invention”).

B. Written Description

41. Whether any Asserted Claim of the Asserted Patents is invalid for failure to satisfy the written description requirement under 35 U.S.C. § 112. *See* 35 U.S.C. § 112. Section 112 of the Patent Act provides that “[t]he specification shall contain a written description of the invention, and of the manner and process of making and using it, in such full, clear, concise, and exact terms as to enable any person skilled in the art . . . to make and use the same.” 35 U.S.C. § 112(a). The written description must reasonably convey “to those skilled in the art that the inventor had

Defendants' Statement of Issues of Law that Remain to be Litigated

possession of the claimed subject matter as of the filing date.” *Ariad Pharms.*, 598 F.3d at 1351. Specifically, the written description must “clearly allow persons of ordinary skill in the art to recognize that [the inventor] invented what is claimed.” *Id.* (citing *In re Gosteli*, 872 F.2d 1008, 1012 (Fed. Cir. 1989)); see also *LizardTech*, 424 F.3d at 1345 (“[The written description] must describe the invention sufficiently to convey to a person of skill in the art that the patentee had possession of the claimed invention at the time of the application, *i.e.*, that the patentee invented what is claimed.”).

42. In determining whether a specification contains an adequate written description, “one must make an ‘objective inquiry into the four corners of the specification from the perspective of a person of ordinary skill in the art.’” *Boston Sci. Corp. v. Johnson & Johnson*, 647 F.3d 1353, 1366 (Fed. Cir. 2011) (citing *Ariad*, 598 F.3d at 1351). “A broad claim is invalid [for lack of adequate written description] when the entirety of the specification clearly indicates that the invention is of a much narrower scope.” *Carnegie Mellon Univ. v. Hoffman-La Roche Inc.*, 541 F.3d 1115, 1127 (Fed. Cir. 2008) (quoting *Cooper Cameron Corp. v. Kvaerner Oilfield Prods., Inc.*, 291 F.3d 1317, 1323 (Fed. Cir. 2002)); see also *Atlantic Res. Mktg. Sys., Inc. v. Troy*, 659 F.3d 1345, 1354-55 (Fed. Cir. 2011) (invalidating claims covering gun accessory without “receiver sleeve attachment point” because specification disclosed only accessory with such an attachment point); *ICU Med., Inc. v. Alaris Med. Sys., Inc.*, 558 F.3d 1368, 1378 (Fed. Cir. 2009) (“[A] person of skill in the art would not understand the inventor . . . to have invented a spikeless medical valve.”); *LizardTech*, 424 F.3d at 1345 (invalidating a claim that was “directed to creating a seamless array of DWT coefficients generically” because the specification taught only “a particular method” of creating such a seamless array). While the written description requirement does not require that the specification recite the claimed invention in any particular way, pointing

Defendants' Statement of Issues of Law that Remain to be Litigated

to an “amalgam of disclosures” from which an artisan could have created the claimed invention does not satisfy this requirement. *Flash-Control, LLC v. Intel Corp.*, 2021 WL 2944592, at *3 (Fed. Cir. July 14, 2021) (citing *Novozymes A/S v. DuPont Nutrition Biosciences APS*, 723 F.3d 1336, 1349 (Fed. Cir. 2013)). Instead, the specification must present each claim as an “integrated whole.” *Id.* Whether a patent claim satisfies the written description requirement is a question of fact. *Ariad*, 598 F.3d at 1351.

C. Indefiniteness

43. Whether any Asserted Claim of the Asserted Patents is invalid for failure to satisfy the definiteness requirement under 35 U.S.C. § 112. The Patent Act requires that a patent claim “particularly point[] out and distinctly claim[] the subject matter which the [applicant] regards as the invention.” 35 U.S.C. § 112(b). Definiteness is a question of law based on underlying fact determinations. *Dow Chem. Co. v. Nova Chems. Corp. (Canada)*, 809 F.3d 1223, 1225 (Fed. Cir. 2015) (citing *Green Edge Enters., LLC v. Rubber Mulch Etc., LLC*, 620 F.3d 1287, 1299 (Fed. Cir. 2010) (“Definiteness ... and enablement ... are both questions of law with underlying factual determinations.”)).

44. The definiteness requirement is intended to provide notice to the public of the precise bounds of the patent rights claimed by the patentee. If a claim fails to inform those skilled in the art of the scope of the invention with reasonable certainty, the claim is invalid. *See ePlus, Inc. v. Lawson Software, Inc.*, 700 F.3d 509, 519 (Fed. Cir. 2012); *see also Gen. Elec. Co. v. Wabash Appliance Corp.*, 304 U.S. 364, 369 (1938) (“The inventor must inform the public during the life of the patent of the limits of the monopoly asserted, so that it may be known which features may be safely used or manufactured without a license and which may not.”) (internal quotation marks omitted)).

Exhibit 5

Defendants' Statement of Issues of Law that Remain to be Litigated

45. The test for determining whether the claims are sufficiently definite is whether the “patent’s claims, viewed in light of the specification and prosecution history, inform those skilled in the art about the scope of the invention with reasonable certainty.” *Nautilus, Inc. v. Biosig Instruments, Inc.*, 134 S. Ct. 2120, 2129 (2014). “[D]efiniteness is measured from the viewpoint of a person skilled in the art at the time the patent was filed.” *Id.* at 2128 (citations omitted). Although absolute or mathematical precision is not required, “[t]he claims, when read in light of the specification and the prosecution history, must provide objective boundaries for those of skill in the art” such that a person skilled in the art is informed about the scope of the invention with “reasonable certainty.” *Interval Licensing LLC v. AOL, Inc.*, 766 F.3d 1364, 1370-71 (Fed. Cir. 2014). “Some modicum of uncertainty ... is the ‘price of ensuring the appropriate incentives for innovation.’” *Teva Pharms. USA, Inc. v. Sandoz, Inc.*, 789 F.3d 1335, 1341 (Fed. Cir. 2015) (quoting *Nautilus*, 134 S. Ct. at 2124). But, “a patent must be precise enough to afford clear notice of what is claimed, thereby apprising the public of what is still open to them.” *Id.* This is particularly important where different approaches to measurement are involved. *Dow Chem. Co. v. Nova Chems. Corp. (Canada)*, 803 F.3d 620, 630 (Fed. Cir. 2015) (“[T]he patent and prosecution history must disclose a single known approach or establish that, where multiple known approaches exist, a person having ordinary skill in the art would know which approach to select.”); *see also Teva*, 789 F.3d at 1341, 1344-45 (holding a claim indefinite where molecular weight could be measured three different ways and would yield different results and the patent and prosecution history did not provide guidance as to which measure to use).

46. “[D]efiniteness ‘is amenable to resolution by the jury where the issues are factual in nature.’” *BJ Servs. Co. v. Haliburton Energy Servs., Inc.*, 338 F.3d 1368, 1372 (Fed. Cir. 2003); *Dow Chem.*, 809 F.3d at 1225 (holding that a “question about the state of the knowledge of a

Defendants' Statement of Issues of Law that Remain to be Litigated

skilled artisan is a question of fact"). When the "question of definiteness ... require[s] the resolution of critical factual issues," it is "properly [put] before the jury." *Bombardier Recreational Prods. Inc. v. Arctic Cat Inc.*, 785 F. App'x 858, 867 (Fed. Cir. 2019); *Ateliers de la Haute-Garonne v. Broetje Automation-USA Inc.*, 14 F. Supp. 3d 588, 591 (D. Del. 2014) (denying summary judgement such that "the issue of indefiniteness will be presented to the jury at trial").

D. Failure to Claim What Applicant/Inventors Regarded as Their Invention

47. Whether any Asserted Claims of the Asserted Patents are invalid for failure to claim what the Applicant/Inventors regarded as their invention under 35 U.S.C. § 112. For "a claim to comply with section 112, paragraph 2, it must satisfy two requirements: first, it must set forth what 'the applicant regards as his invention,' and second, it must do so with sufficient particularity and distinctness, *i.e.*, the claim must be sufficiently 'definite.'" *Solomon v. Kimberly-Clark Corp.*, 216 F.3d 1372, 1377 (Fed. Cir. 2000); *see also Allen Eng'g Corp. v. Bartell Indus., Inc.*, 299 F.3d 1336, 1348 (Fed. Cir. 2002) (explaining that § 112 includes two requirements, one for definiteness and one that the inventors claim what they regard as their invention).

48. A patent claim is invalid under § 112, paragraph 2 "[w]here it would be apparent to one of skill in the art, based on the specification, that the invention set forth in a claim is not what the patentee regarded as his invention." *Allen Eng'g Corp.*, 299 F.3d at 1349. Whether a claim recites the subject matter which the applicant regards as his invention is a question of law. *See Solomon*, 216 F.3d at 1377.

E. Priority Date

49. What is the priority date of the Asserted Claims of the Asserted Patents. "[A] claim in a later application receives the benefit of the filing date of an earlier application so long as the disclosure in the earlier application meets the requirements of 35 U.S.C. § 112, ¶ 1, including the

Defendants' Statement of Issues of Law that Remain to be Litigated

written description requirement, with respect to that claim.” *Tech. Licensing Corp. v. Videotek, Inc.*, 545 F.3d 1316, 1326 (Fed. Cir. 2008). When “a patentee seeks the benefit of the filing date of an earlier filed application, compliance with the written description requirement may turn on whether the disclosure of the earlier application provides ‘adequate support’ for the claims at issue.” *Id.* at 1324. “[T]he prior application must ‘convey with reasonable clarity to those skilled in the art that, as of the filing date sought, [the inventor] was in possession of the invention.’” *Id.* at 1331-32 (quoting *Vas-Cath Inc. v. Mahurkar*, 935 F.2d 1555, 1563-64 (Fed. Cir. 1991)); see also *LizardTech*, 424 F.3d at 1345 (“[The written description] must describe the invention sufficiently to convey to a person of skill in the art that the patentee had possession of the claimed invention at the time of the application, *i.e.*, that the patentee invented what is claimed.”); *Ariad Pharms.*, 598 F.3d at 1351 (en banc) (“the test for sufficiency is whether the disclosure of the application relied upon reasonably conveys to those skilled in the art that the inventor had possession of the claimed subject matter as of the filing date.”).

50. “When an alleged infringer attacks the validity of an issued patent, our well-established law places the burden of persuasion on the attacker to prove invalidity by clear and convincing evidence.” *Tech. Licensing*, 545 F.3d at 1327. The party “having the ultimate burden of proving its defense of invalidity based on anticipating prior art, [] has the burden of going forward with evidence that there is such anticipating prior art,” where “going forward with the evidence” means “both producing additional evidence and presenting persuasive argument based on new evidence or evidence already of record, as the case may require.” *Id.* Then, the patentee “has the burden of going forward with evidence either that the prior art does not actually anticipate, or[] that it is not prior art because the asserted claim is entitled to the benefit of a filing date prior to the alleged prior art. This requires [the patentee] to show not only the existence of the earlier

Defendants' Statement of Issues of Law that Remain to be Litigated

application, but why the written description in the earlier application supports the claim.” *Id.* (internal citation omitted). Finally, “the burden of going forward again shifts to the proponent of the invalidity defense[] to convince the court that [the patentee] is not entitled to the benefit of the earlier filing date.” *Id.* at 1328.

F. Prior Art Under the Pre-AIA and AIA

51. Whether pre-AIA Sections 102 and 103 of the Patent Act apply to the Asserted Claims of the '172 and '220 Patents. *See* 35 U.S.C. §§ 102, 103 (pre-AIA).

52. A patentee is not entitled to a patent if “the invention was described in . . . a patent granted on an application for patent by another filed in the United States before the invention by the applicant for patent.” 35 U.S.C. § 102(e)(2) (pre-AIA). A patentee is also not entitled to a patent if “he did not himself invent the subject matter sought to be patented.” 35 U.S.C. § 102(f) (pre-AIA).

53. “A patent may not be obtained though the invention is not identically disclosed or described as set forth in section 102 , if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains.” 35 U.S.C. § 103 (pre-AIA).

54. “AIA 35 U.S.C. 102 and 103 take effect on March 16, 2013. These new provisions apply to any patent application that contains or contained at any time: (1) A claim to a claimed invention that has an effective filing date that is on or after March 16, 2013; or (2) a designation as a continuation, divisional, or continuation-in-part of an application that contains or contained at any time a claim to a claimed invention that has an effective filing date that is on or after March

Defendants' Statement of Issues of Law that Remain to be Litigated

16, 2013. AIA 35 U.S.C. 102 and 103 also apply to any patent resulting from an application to which AIA 35 U.S.C. 102 and 103 were applied.” 78 Fed. Reg., No. 31, 11072 (Feb. 14, 2013).

55. Pursuant to Section 102 of the Patent Act,

A person shall be entitled to a patent unless (1) the claimed invention was patented, described in a printed publication, or in public use, on sale, or otherwise available to the public before the effective filing date of the claimed invention; or (2) the claimed invention was described in a patent issued under section 151, or in an application for patent published or deemed published under section 122(b), in which the patent or application, as the case may be, names another inventor and was effectively filed before the effective filing date of the claimed invention.

35 U.S.C. § 102(a).

56. “A patent for a claimed invention may not be obtained, notwithstanding that the claimed invention is not identically disclosed as set forth in section 102, if the differences between the claimed invention and the prior art are such that the claimed invention as a whole would have been obvious before the effective filing date of the claimed invention to a person having ordinary skill in the art to which the claimed invention pertains. Patentability shall not be negated by the manner in which the invention was made.” 35 U.S.C. § 103.

G. Anticipation

57. Whether any Asserted Claim of the '172 and '220 Patents is anticipated in view of the prior art under 35 U.S.C. § 102 (pre-AIA) or 35 U.S.C. § 102. Whether any Asserted Claim of the '708 Patent is anticipated in view of the prior art under 35 U.S.C. § 102. An alleged invention must be new to satisfy the requirements of patentability. *See C.R. Bard, Inc. v. M3 Sys., Inc.*, 157 F.3d 1340, 1349 (Fed. Cir. 1998). A patent is not new or novel, however, if it was disclosed in a § 102 prior art reference. *See generally* 35 U.S.C. § 102 (pre-AIA); 35 U.S.C. § 102. A reference anticipates if it is shown “that each element of the claim in issue is found, either expressly or under principles of inherency, in a single prior art reference, or that the claimed invention was previously

Defendants' Statement of Issues of Law that Remain to be Litigated

known or embodied in a single prior art device or practice.” *Minn. Mining & Mfg. Co. v. Johnson & Johnson Orthopaedics, Inc.*, 976 F.2d 1559, 1565 (Fed. Cir. 1992). “Under the principles of inherency, if the prior art necessarily functions in accordance with, or includes, the claims limitations, it anticipates.” *Leggett & Platt, Inc. v. VUTEK, Inc.*, 537 F.3d 1349, 1354 (Fed. Cir. 2008) (internal quotation marks omitted).

58. “The disclosure in an assertedly anticipating reference must be adequate to enable possession of the desired subject matter.” *Elan Pharms.*, 346 F.3d at 1055. “For a prior-art reference to be enabling, it need not enable the claim in its entirety, but instead the reference need only enable a single embodiment of the claim.” *In re Morsa*, 803 F.3d 1374, 1377 (Fed. Cir. 2015). Anticipatory enablement is a less demanding standard than enablement under 35 U.S.C. § 112. *See SRI Int’l, Inc., v. Internet Sec. Systems, Inc.*, 511 F.3d 1186, 1194 (Fed. Cir. 2008) (referencing “the lower enablement standard for prior art”). In particular, anticipatory enablement does not require “actual performance” of the enabling disclosure. *Novo Nordisk Pharms., Inc. v. Bio-Tech. Gen. Corp.*, 424 F.3d 1347, 1355 (Fed. Cir. 2005); *In re Antor Media Corp.*, 689 F.3d 1282, 1290 (Fed. Cir. 2012). “Rather, anticipation only requires that those suggestions be enabled to one of skill in the art.” *Kennametal, Inc. v. Ingersoll Cutting Tool Co.*, 780 F.3d 1376, 1383 (Fed. Cir. 2015) (*quoting Novo Nordisk*, 424 F.3d at 1355). Finally, “both claimed and unclaimed materials disclosed in a [prior art] patent are presumptively enabling.” *In re Antor Media Corp.*, 689 F.3d at 1287; *see also Cubist Pharms., Inc. v. Hospira, Inc.*, 75 F. Supp. 3d 641, 661 & n.10 (D. Del. 2014); *Robocast, Inc. v. Apple Inc.*, 39 F. Supp. 3d 552, 565 (D. Del. 2014).

H. Obviousness

59. Whether any Asserted Claim of the ’172 and ’220 Patents is obvious in view of the prior art under 35 U.S.C. § 103 (pre-AIA) or 35 U.S.C. § 103. *See KSR Int’l Co. v. Teleflex Inc.*,

Defendants' Statement of Issues of Law that Remain to be Litigated

550 U.S. 398, 405, 421 (2007); *Wyers v. MasterLock Co.*, 616 F.3d 1231, 1237 (Fed. Cir. 2010). Whether any Asserted Claim of the '708 Patent is obvious in view of the prior art under 35 U.S.C. § 103. *See KSR*, 550 U.S. at 405; *Wyers*, 616 F.3d at 1237.

60. “[O]bviousness is a matter of law based on findings of underlying fact.” *Sanofi-Synthelabo v. Apotex, Inc.*, 550 F.3d 1075, 1085 (Fed. Cir. 2008). The underlying factual considerations include: “the scope and content of the prior art are to be determined; differences between the prior art and the claims at issue are to be ascertained; and the level of ordinary skill in the pertinent art resolved. Against this background, the obviousness or nonobviousness of the subject matter is determined. Such secondary considerations as commercial success, long felt but unsolved needs, failure of others, etc., might be utilized to give light to the circumstances surrounding the origin of the subject matter sought to be patented.” *KSR*, 550 U.S. at 406 (*quoting Graham v. John Deere Co. of Kansas City*, 383 U.S. 1, 17-18 (1966)); *see also ABT Sys., LLC v. Emerson Elec. Co.*, 797 F.3d 1350, 1357 (Fed. Cir. 2015). Obviousness can be established by noting that “there existed at the time of invention a known problem for which there was an obvious solution encompassed by the patent’s claims.” *KSR*, 550 U.S. at 420. Furthermore, it is not only the specific problem motivating the patentee which is relevant, but rather “any need or problem known in the field of endeavor at the time of invention and addressed by the patent can provide a reason for combining the elements in the manner claimed.” *Id.* In addition, because “[a] person of ordinary skill is also a person of ordinary creativity,” the person of ordinary skill will be able to “fit the teachings of multiple patents together like pieces of a puzzle,” regardless of whether each piece of prior art was designed to solve the problem at hand. *Id.* at 420-21; *see also Leapfrog Enters., Inc. v. Fisher-Price, Inc.*, 485 F.3d 1157, 1161-1162 (Fed. Cir. 2007).

Exhibit 5

Defendants' Statement of Issues of Law that Remain to be Litigated

61. Because obviousness is to be judged under “an expansive and flexible approach” driven by “common sense,” an award of patentability requires “more than the predictable use of prior art elements according to their established functions.” *KSR*, 550 U.S. at 415-18. This flexible standard expands the obviousness analysis beyond just “published articles and the explicit content of issued patents.” *Id.* at 419. As the Supreme Court has articulated, a patent that merely combines “familiar elements according to known methods is likely to be obvious when it does no more than yield predictable results.” *Id.* at 416 (recognizing that when a patent claims a structure already known in the prior art that is altered by the mere substitution of one element for another known in the field, the combination must do more than yield a predictable result). Similarly, where a person of ordinary skill in the art simply pursues “known options” from a “finite number of identified, predictable solutions,” obviousness under § 103 results. *Id.* at 421.

62. Secondary considerations, if present, are also relevant to the obviousness analysis. *ABT Sys., LLC*, 797 F.3d at 1361. Simultaneous or near-simultaneous invention by others is a particularly important secondary consideration that supports holding the claimed invention obvious. *See Geo. M. Martin Co. v. Alliance Mach. Sys. Int’l LLC*, 618 F.3d 1294, 1305-06 (Fed. Cir. 2010) (“Independently made, simultaneous inventions, made ‘within a comparatively short space of time,’ are persuasive evidence that the claimed apparatus ‘was the product only of ordinary ... skill.’”) (*quoting Concrete Appliances Co. v. Gomery*, 269 U.S. 177, 184 (1925)). Other secondary considerations include commercial success, licensing, praise, long-felt need, failure of others, unexpected results, teaching away, and copying. *See KSR*, 550 U.S. at 406 (*quoting Graham*, 383 U.S. at 17-18 (“Such secondary considerations as commercial success, long felt but unsolved needs, failure of others, etc., might be utilized to give light to the circumstances surrounding the origin of the subject matter sought to be patented.”))). In order for these objective

Defendants' Statement of Issues of Law that Remain to be Litigated

indicia of nonobviousness “to be accorded substantial weight, its proponent must establish a nexus between the evidence and the merits of the claimed invention.” *SIBIA Neurosciences, Inc. v. Cadus Pharma., Corp.*, 225 F.3d 1349, 1359 (Fed. Cir. 2000) (quoting *In re GPAC Inc.*, 57 F.3d 1573, 1580 (Fed. Cir. 1995)). However, even if secondary considerations exist, they cannot overcome a “strong prima facie case of obviousness.” *Wyers*, 616 F.3d at 1246.

63. One consideration that is not relevant to the obviousness inquiry is enablement. Even “[a] non-enabling reference may qualify as prior art for the purpose of determining obviousness,” *ABT*, 797 F.3d at 1360 n.2 (quoting *Symbol Tech., Inc. v. Opticon, Inc.*, 935 F.2d 1569, 1578 (Fed. Cir. 1991)), “and even ‘an inoperative device ... is prior art for all that it teaches.’” *Id.* (quoting *Beckman Instruments, Inc. v. LKB Produkter AB*, 892 F.2d 1547, 1551 (Fed. Cir. 1989)); see also *In re Antor Media*, 689 F.3d at 1292.

64. Obviousness is judged from the perspective of a person of ordinary having skill in the art at the time the alleged invention was made. *Takeda Chem. Indus. v. Alphapharm Pty., Ltd.*, 492 F.3d 1350, 1354-55 (Fed. Cir. 2007) (“An invention is not patentable, inter alia, ‘if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art’”) (quoting 35 U.S.C. § 103(a)). A person of ordinary skill is a hypothetical person who is “presumed to be aware of all the pertinent prior art.” *Standard Oil Co. v. Am. Cyanamid Co.*, 774 F.2d 448, 454 (Fed. Cir. 1985).

I. Improper Inventorship

65. Whether the '172 and '220 Patents are invalid for failing to name the proper inventors under 35 U.S.C. § 102(f) (pre-AIA). Under Section 102(f) of the Patent Act, “[a] person shall be entitled to a patent unless...he did not himself invent the subject matter sought to be

Defendants' Statement of Issues of Law that Remain to be Litigated

patented.” *Id.*; see also *In re VerHoef*, 888 F.3d 1362, 1368 (Fed. Cir. 2018) (affirming rejection of claims for improper inventorship under § 102(f)); *PerSeptive Biosystems, Inc. v. Pharmacia Biotech, Inc.*, 225 F.3d 1315, 1321 (Fed Cir. 2000) (“Examiners are required to reject applications under 35 U.S.C. § 102(f) on the basis of improper inventorship.”). This provision “makes the naming of the correct inventor or inventors a condition of patentability; failure to name them renders a patent invalid.” *In re VerHoef*, 888 F.3d at 1367-68 (*quoting Pannu v. Iolab Corp.*, 155 F.3d 1344, 1349-50 (Fed. Cir. 1998)).

66. The Federal Circuit “has stated that ‘[d]etermining ‘inventorship’ is nothing more than determining who conceived the subject matter at issue.’” *In re VerHoef*, 888 F.3d at 1365. “Conception and inventorship are ultimately questions of law . . . but they are premised on underlying factual findings.” *Id.*

67. “When a question of inventorship is presented ‘the critical question ... is who conceived ... the subject matter of the claims at issue.’” *Frank’s Casing Crew & Rental Tools, Inc. v. PMR Techs., Ltd.*, 292 F.3d 1363, 1373 (Fed. Cir. 2002) (*quoting Ethicon, Inc. v. U.S. Surgical Corp.*, 135 F.3d 1456, 1460 (Fed. Cir. 1998)). “To determine whether [a person] made a contribution to the conception of the subject matter of [a claim, the] court must determine what [the person’s] contribution was and then whether that contribution’s role appears in the *claimed invention*.” *Frank’s Casing Crew & Rental Tools*, 292 F.3d at 1373 (*quoting Ethicon*, 135 F.3d at 1461). While “an inventor need not make a contribution to every claim in the patent,” an inventor must contribute to at least one claim. *Frank’s Casing Crew & Rental Tools*, 292 F.3d at 1373. “A joint inventor must: ‘(1) contribute in some significant manner to the conception or reduction to practice of the invention, (2) make a contribution to the claimed invention that is not insignificant in quality, when that contribution is measured against the dimension of the full invention, and (3)

Defendants' Statement of Issues of Law that Remain to be Litigated

do more than merely explain to the real inventors well-known concepts and/or the current state of the art.” *In re VerHoef*, 888 F.3d at 1366 (*quoting Pannu*, 155 F.3d at 1351).

IV. UNENFORCEABILITY OF THE ASSERTED PATENTS

A. Prosecution Laches

68. Whether the '172 and '220 Patents are unenforceable due to prosecution laches. The doctrine of laches is an equitable affirmative defense. *Cancer Research Tech. Ltd. v. Barr Lab'ys Inc.*, 625 F.3d 724, 728 (Fed. Cir. 2010). Prosecution laches may “render a patent unenforceable when it has issued only after an unreasonable and unexplained delay in prosecution that constitutes an egregious misuse of the statutory patent system under a totality of the circumstances.” *Hyatt v. Hirshfeld*, 998 F.3d 1347, 1359-60 (Fed. Cir. 2021) (*quoting Cancer Research*, 625 F.3d at 728). “[T]he doctrine of prosecution laches places an additional, equitable restriction on patent prosecution conduct beyond those imposed by statute or PTO regulation.” *Hyatt*, 998 F.3d at 1366. “An applicant must therefore not only comply with the statutory requirements and PTO regulations but must also prosecute its applications in an equitable way that avoids unreasonable, unexplained delay that prejudices others.” *Id.*

69. Prosecution laches as a defense to infringement requires proof of two elements: (a) that the patentee's delay in prosecution was unreasonable and inexcusable under the totality of the circumstances; and (b) that the accused infringer or the public suffered prejudice attributable to the delay. *Hyatt*, 998 F.3d at 1362 (citing *Cancer Research*, 625 F.3d at 728-29).

70. Whether an applicant's delay is unreasonable is a fact-intensive inquiry that depends on the specific circumstances. *Hyatt*, 998 F.3d at 1366-67. “Determinations of unreasonable delay are not limited to the specific patent application in question; rather, ‘an examination of the totality of the circumstances, including the prosecution history of all of a series

Defendants' Statement of Issues of Law that Remain to be Litigated

of related patents and overall delay in issuing claims, may trigger laches.” *Personalized Media Commc'ns, LLC v. Apple, Inc.*, 552 F. Supp. 3d 664, 685-86 (E.D. Tex. 2021), *aff'd*, 57 F.4th 1346 (Fed. Cir. 2023) (citing *Hyatt*, 998 F.3d at 1366-67).

71. “[P]rosecution laches’ requirement of an unreasonable and unexplained delay includes a finding of prejudice, as does any laches defense. [T]o establish prejudice an accused infringer must show evidence of intervening rights, *i.e.*, that either the accused infringer or others invested in, worked on, or used the claimed technology during the period of delay.” *Personalized Media Commc'ns*, 552 F. Supp. 3d at 690, *aff'd*, 57 F.4th 1346 (quoting *Cancer Research*, 625 F.3d at 729).

B. Inequitable Conduct

72. Whether the '172 and '220 Patents are unenforceable due to inequitable conduct for improper inventorship. “Inequitable conduct is an equitable defense to patent infringement that, if proved, bars the enforcement of a patent.” *Therasense, Inc. v. Becton, Dickinson & Co.*, 649 F.3d 1276, 1285 (Fed. Cir. 2011). The Federal Circuit has been clear that it “is the inequitable-conduct rules that provide a safety valve in the event of deceit.” *Egenera, Inc. v. Cisco Sys., Inc.*, 972 F.3d 1367, 1377 (Fed. Cir. 2020).

1. Inequitable Conduct Based On Improper Inventorship

73. Inequitable conduct may be based on improper inventorship when “the named inventors of the patents made material misrepresentations regarding inventorship with intent to deceive the PTO during the prosecution of the patents.” *PerSeptive Biosystems*, 225 F.3d at 1317 (affirming district court’s inequitable conduct holding).

74. “Inequitable conduct includes affirmative misrepresentations of a material fact, failure to disclose material information, or submission of false material information, coupled with

Defendants' Statement of Issues of Law that Remain to be Litigated

an intent to deceive.” *Id.* at 1318 (internal citation omitted). “A party asserting inequitable conduct must prove by clear and convincing evidence that a patent applicant breached that duty by (1) ‘fail[ing] to disclose material information or submit [ting] materially false information to the PTO’ with (2) ‘intent to mislead or deceive the examiner.’” *Advanced Magnetic Closures*, 607 F.3d 817, 829 (Fed. Cir. 2010) (*quoting McKesson Info. Sols.*, 487 F.3d at 913).

75. “Determination of inequitable conduct requires a two-step analysis. First, the trial court must determine whether the conduct meets a threshold level of materiality. The trial court must then also determine whether the evidence shows a threshold level of intent to mislead the PTO . . . Once the threshold levels of materiality and intent have been established, the trial court is required to weigh materiality and intent. The more material the conduct, the less evidence of intent will be required in order to find that inequitable conduct has occurred. In light of all the circumstances, the court must then determine whether the applicant’s conduct is so culpable that the patent should be held unenforceable.” *PerSeptive Biosystems*, 225 F.3d at 1318-19 (internal citations omitted).

76. “Under the materiality prong, information is material when a reasonable examiner would ‘likely consider [the information] important in deciding whether to allow an application to issue as a patent.’” *Advanced Magnetic Closures*, 607 F.3d at 829. “Although but-for materiality generally must be proved to satisfy the materiality prong of inequitable conduct, this court recognizes an exception in cases of affirmative egregious misconduct.” *Therasense*, 649 F.3d at 1292.

77. As “a critical requirement for obtaining a patent, inventorship is material.” *Advanced Magnetic Closures*, 607 F.3d at 830 (*citing PerSeptive Biosystems*, 225 F.3d at 1321); *see also* 35 U.S.C. § 102(f) (pre-AIA) (“A person shall be entitled to a patent unless...he did not

Defendants' Statement of Issues of Law that Remain to be Litigated

himself invent the subject matter sought to be patented.”); 35 U.S.C. § 101; *In re VerHoef*, 888 F.3d at 1368 (affirming rejection of claims for improper inventorship under § 102(f)); *PerSeptive Biosystems*, 225 F.3d at 1321 (“Examiners are required to reject applications under 35 U.S.C. § 102(f) on the basis of improper inventorship.”).

78. The Federal Circuit “has stated that ‘[d]etermining ‘inventorship’ is nothing more than determining who conceived the subject matter at issue.’” *In re VerHoef*, 888 F.3d at 1365. “Conception and inventorship are ultimately questions of law . . . but they are premised on underlying factual findings.” *Id.*

79. “When a question of inventorship is presented ‘the critical question ... is who conceived ... the subject matter of the claims at issue.’” *Frank’s Casing Crew & Rental Tools*, 292 F.3d at 1373 (quoting *Ethicon*, 135 F.3d at 1460). “To determine whether [a person] made a contribution to the conception of the subject matter of [a claim, the] court must determine what [the person’s] contribution was and then whether that contribution’s role appears in the *claimed invention*.” *Frank’s Casing Crew & Rental Tools*, 292 F.3d at 1373 (quoting *Ethicon*, 135 F.3d at 1461). While “an inventor need not make a contribution to every claim in the patent,” an inventor must contribute to at least one claim. *Frank’s Casing Crew & Rental Tools*, 292 F.3d at 1373. “A joint inventor must: ‘(1) contribute in some significant manner to the conception or reduction to practice of the invention, (2) make a contribution to the claimed invention that is not insignificant in quality, when that contribution is measured against the dimension of the full invention, and (3) do more than merely explain to the real inventors well-known concepts and/or the current state of the art.’” *In re VerHoef*, 888 F.3d at 1366 (quoting *Pannu*, 155 F.3d at 1351).

80. “Under the intent prong, a party can prove intent to deceive the PTO based on direct evidence or on circumstantial evidence ‘with the collection of inferences permitting a

Defendants' Statement of Issues of Law that Remain to be Litigated

confident judgment that deceit has occurred.” *Advanced Magnetic Closures*, 607 F.3d at 829 (quoting *McKesson Info. Sols.*, 487 F.3d at 913). “Because direct evidence of deceptive intent is rare, a district court may infer intent from indirect and circumstantial evidence. However, to meet the clear and convincing evidence standard, the specific intent to deceive must be ‘the single most reasonable inference able to be drawn from the evidence.’” *Therasense*, 649 F.3d at 1290 (quoting *Star Sci., Inc. v. R.J. Reynolds Tobacco Co.*, 537 F.3d 1357, 1366 (Fed. Cir. 2008) (internal citation omitted)). “When an applicant falsely claims that he has invented a device, he can hardly claim the right to enforce a patent to which he was never entitled . . . [A] district court can, *a fortiori*, exercise its discretion to hold a patent unenforceable when a person falsely swears that he invented a device before the PTO.” *Advanced Magnetic Closures*, 607 F.3d at 832.

81. The Federal Circuit “ha[s] explained that ‘if unenforceable due to inequitable conduct, a patent may not be enforced even by ‘innocent’ co-inventors. One bad apple spoils the entire barrel. Misdeeds of co-inventors, or even a patent attorney, can affect the property rights of an otherwise innocent individual.’” *Frank’s Casing Crew & Rental Tools*, 292 F.3d at 1377 (quoting *Stark v. Advanced Magnetics, Inc.*, 119 F.3d 1551, 1556 (Fed. Cir. 1997)).

V. DEFENDANTS’ REMEDIES

A. Exceptional Case

82. Whether Defendants are entitled to its costs and attorneys’ fees under 35 U.S.C. § 285. “The court in exceptional cases may award reasonable attorney fees to the prevailing party.” 35 U.S.C. § 285. An award of “attorney fees is not automatic, even for the extraordinary case.” *Nat’l Presto Indus., Inc.*, 76 F.3d at 1197 (affirming denial of attorneys’ fees even though willful infringement was found). Entitlement to attorneys’ fees under 35 U.S.C. § 285 is not automatic,

Defendants' Statement of Issues of Law that Remain to be Litigated

and must be demonstrated by a preponderance of the evidence. *Octane Fitness, LLC v. ICON Health & Fitness, Inc.*, 572 U.S. 545, 557 (2014).

83. The Supreme Court has defined an “exceptional” case as “one that stands out from others with respect to the substantive strength of a party’s litigating position (considering both the governing law and the facts of the case) or the unreasonable manner in which the case was litigated.” *Id.* at 554. The district court “may determine whether a case is ‘exceptional’ in the case-by-case exercise of their discretion, considering the totality of the circumstances.” *Id.*

84. “[A] strong or even correct litigating position is not the standard by which [the court] assess[es] exceptionality.” *Stone Basket Innovations, LLC*, 892 F.3d at 1180). “A party’s position on issues of law ultimately need not be correct for them to not ‘stand[] out,’ or be found reasonable.” *Id.* (quoting *SFA Sys., LLC*, 793 F.3d at 1348).

EXHIBIT 6

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NATERA, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 20-125 (GBW)
)	(CONSOLIDATED)
ARCHERDX INC., ARCHERDX LLC, and)	
INVITAE CORPORATION)	
)	
Defendants.		

EXHIBIT 6: PLAINTIFF'S WITNESS LIST

Plaintiff Natera, Inc. (“Natera”) identifies the following fact witnesses that it may call live or by deposition at trial. Natera reserves the right to modify this list in accordance with Fed. R. Civ. P. 26(a)(3), D. Del. LR 16.3, or in view of other events or changed circumstances that may occur before or during trial. Natera expressly reserves the right to call live or by deposition any witness on its witness list or any witness on the witness list of Defendants. This list is not a commitment that Natera will call any particular witness at trial, or a representation that any witness listed is available or will appear for trial. If any Natera, Defendants, or third-party witness is unavailable or refuses to testify live, Natera reserves the right to use their deposition testimony. With respect to Defendants’ witnesses, Natera reserves the right to introduce testimony through deposition or live examination, as appropriate. In addition, Natera reserves the right to call any witness, whether listed below or not, to establish authenticity and/or admissibility of any trial exhibit whose authenticity or admissibility is challenged by Defendants. Notwithstanding providing this list, Natera makes no representation regarding its ability to force any witness to appear at trial unwillingly.

Natera also reserves the right to call in its case in chief any witness identified by Defendants and to call by deposition any witness identified by Defendants who does not testify at trial or who is unavailable. Natera also reserves the right to call any witness in its list either in its case in chief, or as a rebuttal witness, or both.

I. FACT WITNESSES

A. Witnesses Natera Intends to Call to Testify (Live or by Deposition)

1. Matthew Rabinowitz (Live)
2. John Fesko (Live)
3. Solomon Moshkevich (Live)

4. Bernhard Zimmermann (Live)
5. George Gemelos (Live)
6. Laboratory Corporation of America / Taylor Jensen (Live/Designation)
7. SeraCare Corporation / Yves Konigshofer (Live/Designation)
8. Defendants' Corporate Representative

B. Witnesses Natera May Call to Testify

1. Michael Brophy
2. Zachary Demko
3. Allison Ryan
4. Joshua Babiarz
5. Alexander Wong
6. Huseyin Eser Kirkizlar
7. Philippe Lacroute
8. Tudor Constantin
9. Lane Eubank
10. Matthew Hill
11. Michael Dodd
12. Milena Banjevic
13. Onur Sakarya
14. Joshua Stahl
15. Robert Daber
16. Ryan Walters
17. Sandra Close

18. Tim Holwick
19. Jill Stefanelli
20. Darren Fogg
21. Holly Tilson
22. Mariah White
23. Todd Druley
24. Jeffrey Costa
25. Sunny Gilbert
26. Jason Myers
27. John Iafrate
28. Long Le
29. All witnesses named on Defendants' trial witness list

II. EXPERT WITNESSES

Natera lists below the names of the experts it may call at trial. Natera intends to call its experts live at trial and does not currently intend to seek to introduce their testimony by deposition designation unless one or more of its experts becomes unavailable and/or is unable or unwilling to travel or testify live at trial.

1. Dr. John Quackenbush
2. Dr. Paul Spellman
3. Mr. Robert Stoll
4. Mr. Jerzy Wojcik
5. Dr. Ryan Sullivan
6. Dr. Anup Malani

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

NATERA, INC.,)	
)	
<i>Plaintiff / Counterclaim-Defendant,</i>)	
)	
v.)	C.A. No. 20-125 (GBW)
)	
ARCHERDX, INC., ARCHERDX, LLC and)	
INVITAE CORP.,)	
)	
<i>Defendants / Counterclaimants.</i>)	
_____)	

EXHIBIT 6

DEFENDANTS' OBJECTIONS TO NATERA'S WITNESS LIST

Exhibit 6
Defendants' Objections to Natera's Witness List

Defendants ArcherDX, Inc., ArcherDX, LLC and Invitae Corporation (collectively, "Defendants") object to any testimony by any of Plaintiff Natera, Inc.'s ("Natera") expert witnesses to the extent their testimony is outside the scope of their expert reports, their expertise, or their opinions offered in this case. Defendants also object to any testimony by any of Natera's expert witnesses to the extent their testimony pertains to any opinions that have either been stricken or precluded by the Court. Defendants further object to any testimony by any of Natera's expert witnesses to the extent their testimony pertains to any issue that has been decided by the Court.

Defendants object to Natera calling at trial any witness listed on its witness list by deposition testimony to the extent that the witness testifies live at trial. Defendants also object to Natera calling at trial any fact witnesses not identified on Natera's FRCP 26(a)(1) disclosures, not identified as a document custodian, and not deposed in his personal capacity or not designated on specific FRCP 30(b)(6) deposition topics.

EXHIBIT 7

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

NATERA, INC.,)	
)	
<i>Plaintiff / Counterclaim-Defendant,</i>)	
)	
v.)	C.A. No. 20-125 (GBW)
)	
ARCHERDX, INC., ARCHERDX, LLC and)	
INVITAE CORP.,)	
)	
<i>Defendants / Counterclaimants.</i>)	
_____)	

EXHIBIT 7

DEFENDANTS' PRELIMINARY TRIAL WITNESS LIST

Exhibit 7
Defendants' Preliminary Trial Witness List

Pursuant to Delaware Local Rule 16.3, Defendants ArcherDX, Inc., ArcherDX, LLC and Invitae Corporation (collectively, "Defendants") hereby submit the preliminary list of witnesses Defendants will or may call to testify at trial live or by deposition. The inclusion of a witness on this list does not require Defendants to call that witness to testify, and does not imply or establish that Defendants have the power to compel the live testimony of that witness or make that witness available to the opposing party. Defendants expressly reserve the right to call any witness identified by Plaintiff Natera, Inc. ("Natera"), whether or not listed on Defendants' list below. Defendants also expressly reserve the right to call any witness for purposes of rebuttal, impeachment, or authentication of a document.

Subject to, and without waiving the foregoing rights and objections, Defendants identify the following preliminary list of trial witnesses it will or may call to testify before the jury:

I. DEFENDANTS' WILL CALL WITNESSES

A. Fact Witnesses

Defendants expect to call the following fact witnesses at trial:

Robert Daber (Live)

Joshua Stahl (Live)

Long Phi Le (Live)

Philippe Lacroute (Live/Designation)

Tudor Constantin (Live/Designation)

Allison Ryan (Live/Designation)

Milena Banjevic (Live/Designation)

Natera's Corporate Representative

Exhibit 7
Defendants' Preliminary Trial Witness List

B. Expert Witnesses

Defendants expect to call the following expert witnesses at trial:

Stephen Amato (Live)

Gregory Cooper (Live)

Nathan Kelley (Live)

James Malackowski (Live)

All expert witnesses named on Natera's trial witness list

II. DEFENDANTS' MAY CALL WITNESSES

Defendants may call the following fact witnesses at trial:

Jill Stefanelli

John Iafrate

Ryan Walters

Sandra Close

Jeffrey Costa

Todd Druley

Darren Douglas Fogg

Sunny Gilbert

Timothy Holwick

Taylor Jensen

Yves Konigshofer

Jason Myers

Holly Tillson

Mariah Tiffany White

Exhibit 7
Defendants' Preliminary Trial Witness List

Joshua Babiarz

Michael Brophy

Zachary Demko

Michael Dodd

Lane Eubank

John Fesko

George Gemelos

Solomon Moshkevich

Matthew Micah Hill

Onur Sakarya

Bernhard Zimmermann

Huseyin Eser Kirkizlar

Matthew Rabinowitz

Alexander Wong

All witnesses named on Natera's trial witness list

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NATERA, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 20-125 (GBW)
)	(CONSOLIDATED)
ARCHERDX INC., ARCHERDX LLC, and)	
INVITAE CORPORATION)	
)	
Defendants.		

**NATERA’S PRELIMINARY OBJECTIONS TO
DEFENDANTS’ TRIAL WITNESS LIST (EXHIBIT 7 TO THE PRETRIAL ORDER)**

Natera provides its preliminary objections to Defendants’ Trial Witness List (Ex. 7 to the Pretrial Order). Natera reserves the right to revise, modify, supplement, or change its objections in response to subsequent Court rulings and/or Defendants’ identification of issues of law and fact to be litigated or any new issues Defendants may raise, or for other good cause.

1. Natera objects to Defendants’ Trial Witness List as excessive, and in violation of the Federal Rules of Civil Procedure and Local Rules, as it does not fairly disclose who Defendants’ intend to call at trial. Specifically, for a five-day jury trial (when Defendants will be allotted no more than 50% of trial time), Defendants have designated twelve witnesses on its “Will Call” list and twenty-eight witnesses on its “May Call” list. Natera reserves the right to seek relief from the Court should Defendants fail to provide adequate disclosure of the witnesses it will actually call sufficiently in advance of trial.

2. Natera objects to the presentation of deposition testimony of any witness that is

available pursuant to Federal Rule of Civil Procedure 32 or appears at trial for any purpose. Natera reserves the right to provide objections and counter-designations should Defendants be permitted to introduce testimony for such witnesses.

3. Natera objects to the inclusion of objections or colloquy made by counsel in any designated deposition testimony.

4. Natera objects to any witness designated by Defendants that is the subject of, or may offer testimony that is the subject of, any motions *in limine* or *Daubert* motions filed by Natera.

5. Natera objects to Defendants calling any live witnesses by videoconference absent prior agreement or order of the Court.

6. Natera reserves the right to seek to introduce any testimony and/or call any witness listed in Defendants' Witness List, if otherwise admissible.

7. Natera reserves the right to utilize deposition designations made by Defendants, as well as undesignated portions of deposition testimony for demonstratives, impeachment purposes or rebuttal.

8. Natera reserves the right to object to any specific questions or testimony at the time proffered to the Court.

9. For any exhibits appearing within Defendants' designated testimony, Natera's objections to use of such exhibits may appear in Defendants' Trial Exhibit List (Exhibit 11).

10. For any exhibits appearing within Defendants' designated testimony, Natera objects to Defendants' reliance on any exhibits that appear in Defendants' designations but that are not included in Defendants' Trial Exhibit List (Exhibit 11).

I. GENERAL OBJECTIONS

A. Fact Witnesses

11. Natera incorporates by reference any objection to proposed deposition testimony of any witness as set forth in Natera's objections to Defendants' deposition designations.

12. Natera objects to the testimony of any witness for which that witness lacks personal knowledge, testimony outside the scope of the Federal Rule of Civil Procedure 30(b)(6) testimony for which a witness was designated, testimony beyond the description for such witness as set forth in Defendants' Federal Rule of Civil Procedure 26(a) initial disclosures, testimony beyond the scope of Defendants' interrogatory responses, and/or testimony not otherwise properly disclosed under the Federal Rules of Civil Procedure.

13. Natera objects to the testimony of any witness to the extent that it is impermissible under Federal Rules of Evidence 15, 701, 702, 703, 611, 401, 402, and/or 403.

14. Natera objects to the testimony of any fact witness relating to claims or defenses that are no longer being asserted in this case. Such evidence is irrelevant, potentially confusing and thus prejudicial, and a waste of time.

15. Natera objects to the testimony of any fact witness relating to any equitable defenses asserted by Defendants and/or Natera's request for injunctive relief. Such evidence is irrelevant to any issues properly before the jury, potentially confusing and thus prejudicial, and a waste of time.

16. Natera reserves the right to provide objections and counter-designations to the designations of the transcripts of any witnesses' depositions by Defendants.

17. Natera objects to Defendants calling their own witnesses by designation absent an adequate showing under Federal Rule of Civil Procedure 32.

18. Natera reserves the right to object to Defendants calling witnesses identified on

Natera's Witness List but not on Defendants' Trial Witness List should Defendants attempt to call any such witnesses live or by deposition.

B. Expert Witnesses

19. Natera objects to the testimony of Defendants' experts to the extent that their testimony is related to any evidentiary issues raised by Natera in the parties' proposed Pretrial Order.

20. Natera objects to Defendants calling any of their expert witnesses by deposition.

21. Natera objects to Defendants' experts and their testimony to the extent that Defendants' experts attempt to opine on matters outside the scope of their Federal Rule of Civil Procedure 26(a)(2)(B) expert reports, deposition testimony, or their respective experience or purported areas of expertise.

22. Natera objects to Defendants' experts and their testimony to the extent that they or the testimony are objectionable under one or more of Federal Rules of Evidence 105, 702, 703, 611, 401, 402, and/or 403.

23. Natera objects to the testimony of any expert witness relating to claims or defenses that are no longer being asserted in this case. Such evidence is irrelevant, potentially confusing and thus prejudicial, and a waste of time.

24. Natera objects to the testimony of any expert witness relating to any equitable defenses asserted by Defendants and/or Natera's request for injunctive relief. Such evidence is irrelevant to any issues properly before the jury, potentially confusing and thus prejudicial, and a waste of time.

25. Natera objects to Defendants' experts and their testimony to the extent that they or the testimony are duplicative of the testimony of other witnesses, including to the extent duplicative/cumulative over the testimony of Defendants' other experts.

26. Natera objects to Defendants' experts and their testimony to the extent that they or the testimony have not been properly, timely, and sufficiently disclosed during fact or expert discovery pursuant to Federal Rules of Civil Procedure 26 and 37.

27. Natera objects to Defendants' experts and their testimony to the extent that they or it attempt to offer any rebuttal opinions not sufficiently described in the expert reports.

II. SPECIFIC OBJECTIONS

A. Fact Witnesses

28. **Joshua Stahl.** Natera objects to Defendants' calling Joshua Stahl to the extent that his testimony is the subject of, or may offer testimony that is the subject of, Natera's pending motion *in limine*. See Pretrial Order, Ex. 17 (Natera's motions *in limine*). Natera further objects to Defendants' calling Joshua Stahl to the extent that Joshua Stahl is expected to provide testimony relating to Defendants' equitable defense of prosecution laches. Such testimony on issues wholly equitable in nature is irrelevant to any issues properly before the jury. Such testimony would also be highly prejudicial, confusing and misleading to the jury.

29. **Long Le.** Natera objects to Defendants' calling Long Le on their "Will Call" witness list. Dr. Le is one of the purported inventors of Defendants' infringing technology and is likely to testify about the timing of Defendants' development of the infringing technology at Massachusetts General Hospital ("MGH"). Dr. Le's likely testimony on the timing and development of the infringing technology is irrelevant, given that Defendants are not asserting prior invention by MGH of infringing technology under Section 102(g). Similarly, any testimony by Dr. Le about his patent, alleged to be an anticipating reference, is not relevant. There is no dispute that Dr. Le's patent was filed after the priority date of Natera's cfDNA Patents. Even if Dr. Le's patent constitutes prior art, whether it anticipates the Asserted Claims of the cfDNA Patents is the province of Defendants' expert, not fact testimony by Dr. Le. Dr. Le is also unlikely

to provide any relevant testimony about ArcherDX. Although a co-founder, Dr. Le is not, and has never been, an employee of ArcherDX, was not involved in the running of the company, nor did he have any role in ArcherDX's decision to develop or market the accused products. Dr. Le also was not involved in negotiations pertaining to ArcherDX's license with MGH. Dr. Le is, and continues to be, employed by MGH and as he candidly testified during his deposition, his ethical/employment obligations with MGH requires him to remain separate from ArcherDX. Testimony relating to the aforementioned subject matter by Dr. Le would also be highly prejudicial, confusing and misleading to the jury.

30. **Philippe Lacroute.** Natera objects to Defendants' calling Phillippe Lacroute to the extent that his testimony is the subject of, or may offer testimony that is the subject of, Natera's pending motion *in limine*. See Pretrial Order, Ex. 17 (Natera's motions *in limine*).

31. **Tudor Constantin.** Natera objects to Defendants' calling Tudor Constantin to the extent that his testimony is the subject of, or may offer testimony that is the subject of, Natera's pending motion *in limine*. See Pretrial Order, Ex. 17 (Natera's motions *in limine*).

32. **Allison Ryan.** Natera objects to Defendants' calling Allison Ryan to the extent that her testimony is the subject of, or may offer testimony that is the subject of, Natera's pending motion *in limine*. See Pretrial Order, Ex. 17 (Natera's motions *in limine*).

33. **Milena Banjevic.** Natera objects to Defendants' calling Milena Banjevic to the extent that her testimony is the subject of, or may offer testimony that is the subject of, Natera's pending motion *in limine*. See Pretrial Order, Ex. 17 (Natera's motions *in limine*).

34. **Joshua Babiarz.** Natera objects to Defendants' calling Joshua Babiarz to the extent that his testimony is the subject of, or may offer testimony that is the subject of, Natera's pending motion *in limine*. See Pretrial Order, Ex. 17 (Natera's motions *in limine*).

35. **Zachary Demko.** Natera objects to Defendants' calling Zachary Demko to the extent that his testimony is the subject of, or may offer testimony that is the subject of, Natera's pending motion *in limine*. See Pretrial Order, Ex. 17 (Natera's motions *in limine*).

36. **Michael Dodd.** Natera objects to Defendants' calling Michael Dodd to the extent that his testimony is the subject of, or may offer testimony that is the subject of, Natera's pending motion *in limine*. See Pretrial Order, Ex. 17 (Natera's motions *in limine*).

37. **Lane Eubank.** Natera objects to Defendants' calling Lane Eubank to the extent that his testimony is the subject of, or may offer testimony that is the subject of, Natera's pending motion *in limine*. See Pretrial Order, Ex. 17 (Natera's motions *in limine*).

38. **George Gemelos.** Natera objects to Defendants' calling George Gemelos to the extent that his testimony is the subject of, or may offer testimony that is the subject of, Natera's pending motion *in limine*. See Pretrial Order, Ex. 17 (Natera's motions *in limine*).

39. **Matthew Micah Hill.** Natera objects to Defendants' calling Matthew Hill to the extent that his testimony is the subject of, or may offer testimony that is the subject of, Natera's pending motion *in limine*. See Pretrial Order, Ex. 17 (Natera's motions *in limine*).

40. **Onur Sakarya.** Natera objects to Defendants' calling Onur Sakarya to the extent that his testimony is the subject of, or may offer testimony that is the subject of, Natera's pending motion *in limine*. See Pretrial Order, Ex. 17 (Natera's motions *in limine*).

41. **Bernhard Zimmermann.** Natera objects to Defendants' calling Bernhard Zimmermann to the extent that his testimony is the subject of, or may offer testimony that is the subject of, Natera's pending motion *in limine*. See Pretrial Order, Ex. 17 (Natera's motions *in limine*). Natera further objects to any presentation of Bernhard Zimmermann's deposition testimony to the extent that he testifies live at trial.

42. **Huseyin Eser Kirkizlar.** Natera objects to Defendants' calling Huseyin Kirkizlar to the extent that his testimony is the subject of, or may offer testimony that is the subject of, Natera's pending motion *in limine*. See Pretrial Order, Ex. 17 (Natera's motions *in limine*).

43. **Matthew Rabinowitz.** Natera objects to Defendants' calling Matthew Rabinowitz to the extent that his testimony is the subject of, or may offer testimony that is the subject of, Natera's pending motion *in limine*. See Pretrial Order, Ex. 17 (Natera's motions *in limine*). Natera further objects to any presentation of Matthew Rabinowitz's deposition testimony to the extent that he testifies live at trial.

44. **Alexander Wong.** Natera objects to Defendants' calling Alexander Wong to the extent that his testimony is the subject of, or may offer testimony that is the subject of, Natera's pending motion *in limine*. See Pretrial Order, Ex. 17 (Natera's motions *in limine*).

45. **John Fesko.** Natera objects to any presentation of John Fesko's deposition testimony to the extent that he testifies live at trial.

46. **Solomon Moshkevich.** Natera objects to any presentation of Solomon Moshkevich's deposition testimony to the extent that he testifies live at trial.

47. **Natera's Corporate Representative.** Natera objects to Defendants' calling Natera's Corporate Representative to the extent that his/her testimony is the subject of, or may offer testimony that is the subject of, Natera's pending motion *in limine*. See Pretrial Order, Ex. 17 (Natera's motions *in limine*). Natera objects to any presentation of Natera's Corporate Representative's deposition testimony to the extent that he testifies live at trial.

B. Expert Witnesses

48. **Gregory Cooper.** Natera objects to Defendants' calling Dr. Cooper to the extent that his testimony is the subject of, or may offer testimony that is the subject of, Natera's pending motion *in limine* and *Daubert* motion. See Pretrial Order, Ex. 17 (Natera's motions *in limine*);

D.I. 432, 450. Natera further objects to Defendants' calling Dr. Cooper to the extent that Dr. Cooper is expected to provide testimony relating to invalidity of the cfDNA Patents for improper inventorship.

49. **Nathan Kelley.** Natera objects to Defendants' calling Mr. Kelley to the extent that his testimony is the subject of, or may offer testimony that is the subject of, Natera's pending motion *in limine* and *Daubert* motion. *See* Pretrial Order, Ex. 17 (Natera's motions *in limine*); D.I. 432, 450. Natera further objects to Defendants' calling Mr. Kelley to the extent that Mr. Kelley is expected to provide testimony relating to patent law and/or Patent Office practices or procedures relating to Defendants' equitable defense of prosecution laches. Such testimony on issues wholly equitable in nature is irrelevant to any issues properly before the jury. *See, e.g., Chrimar Holding Company, LLC v. ALE USA Inc.*, 732 Fed. Appx. 876, 881 (Fed. Cir. 2018) (noting equitable defenses including prosecution laches were left to the court after jury trial).

EXHIBIT 8

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NATERA, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 20-125 (GBW)
)	(CONSOLIDATED)
ARCHERDX INC., ARCHERDX LLC, and)	
INVITAE CORPORATION)	
)	
Defendants.		

EXHIBIT 8: NATERA'S DEPOSITION DESIGNATIONS

Pursuant to D. Del. L.R. 16.3, Natera hereby submits the attached list of deposition designations that it may offer at trial. Natera reserves the right to revise, modify, supplement, or change these designations (whether designated or not) in response to subsequent Court rulings, any new issues Defendants may raise, or for other good cause, including but not limited to further reducing the designations set forth in the attached designations, for purposes of cross-examination, impeachment, and/or rebuttal. Natera reserves the right to designate additional deposition testimony or call any witness for live testimony in response to any of Defendants' deposition designations or for any other reason. Natera also reserves the right to assert its original affirmative designation as a counter-counter designation to any counter-designation listed by Defendants.

Natera's designations include all exhibits that are referenced in the specified pages and lines, whether or not such exhibits are separately identified. Natera reserves all rights to use any deposition testimony designated by Defendants. Inclusion of a deposition designation on this list is neither an admission, nor a representation as to the admissibility of or relevance to any issue of any deposition designation. By designating deposition testimony, Natera is neither representing nor admitting that Natera has the burden of proof on any topic. Natera generally objects to any deposition testimony counter-designated by Defendants that is the subject of the parties' stipulations, agreed motions *in limine* (if any), Natera's motions *in limine*, motions to exclude certain evidence, *Daubert* motions and challenges to experts, and any dispositive motions. Natera reserves all rights to make additional objections leading up to and at trial.

NATERA'S OBJECTION KEY

Code	F.R.E. Rule	Objection Description
28 U.S.C. § 1744	28 U.S.C. § 1744	Uncertified U.S. patent
28 U.S.C. § 1745	28 U.S.C. § 1745	Uncertified foreign patent
A	F.R.E. 901-902	Authenticity
AF	No applicable F.R.E.	Assumes facts not in evidence
ARG	F.R.E. 403, 611(a)	Argumentative
BRPL	No applicable F.R.E.	Brief, Pleading, or Order
C	F.R.E. 611	Cumulative
CD	F.R.E. 403, 611(a)	Compound
DEP	No applicable F.R.E.	Improper Inclusion of Deposition or Trial Transcript
EXPERT	No applicable F.R.E.	Improper Use of Expert Report
FL	F.R.E. 604; 28 U.S.C. § 1827	Foreign Language without translation or translation deficient
FN	F.R.E. 602	Lack of foundation
FRE 1002-1003	F.R.E. 1002-1003	Not best evidence
FRE 1004	F.R.E. 1004	Other Content Evidence
FRE 1006	F.R.E. 1006	Inadmissible summary
FRE 105	F.R.E. 105	Limited admissibility
FRE 106	F.R.E. 106	Incomplete designation
FRE 403	F.R.E. 403	Unfairly prejudicial, cumulative, waste of time
FRE 408	F.R.E. 408	Compromise/offers to compromise
FRE 608	F.R.E. 608	Character evidence inadmissible
FRE 611	F.R.E. 611	Leading
H	F.R.E. 801-802	Hearsay
HH	F.R.E. 805	Hearsay within hearsay
ID	F.R.E. 104, 403	Incomplete designation
IH	No applicable F.R.E.	Incomplete Hypothetical
L	F.R.E. 701	Legal conclusion
M	No applicable F.R.E.	Multiple Documents
MIL	No applicable F.R.E.	Inadmissible on a ground asserted in a motion <i>in limine</i>
MIS	F.R.E. 403, 611(a)	Misstates testimony
NR	F.R.C.P. 26(a)(2)	Not relied on by any expert in support of opinion
O	F.R.E. 701, 702, 703	Opinion Testimony By Lay Witness

PRIV	F.R.E. 501, 502	Privileged
PRIVACY	No applicable F.R.E.	Contains private personal information protected from disclosure under relevant law
Q	No applicable F.R.E.	Low quality/illegible
R	F.R.E. 401-402	Not relevant
S	F.R.E. 602, 701, 702	Speculation
U	F.R.C.P. 26, 37	Untimely
V	F.R.E. 611(a)	Vague

EXHIBIT 8: NATERA'S DEPOSITION DESIGNATIONS

Rule 30(b)(1) Deposition Designations Sandra Close				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
7:20–25				
8:5–7				
11:10–11				
12:2–9				
29:4–18				
34:2–5				
35:3–23	R, 403, SPEC			
36:12–15				
36:24–37:9	R, 403, I, OB	36:23; 37:10-16	FRE 403, R, S	
45:23–46:7	R, 403, SPEC, OB, V	46:8; 46:10-20; 46:22-24	FRE 403, R, S, FN	
51:8–24	R, 403, F, IH, OB, SPEC, V	51:25-52:2 52:3-52:22 52:24	L, O, FRE 403, R, V	
65:20–23		65:6-8; 65:11-13	L, O, S, R, FRE 403	
66:2–5	R, 403, F, OB, V, SPEC			
66:7–10	R, 403, F, OB, V, SPEC			
73:10–75:24	R, 403, OB, SPEC, V			
76:17–77:24	R, 403, F, OB, SPEC, V	77:25-78:1; 78:3-7	V, FRE 403, R, FN	
78:8–20	R, 403, I, OB, SPEC, V	77:25-78:1; 78:3-7	V, FRE 403, R, FN	
78:21–25	R, 403, I, V	77:25-78:1; 78:3- 20	V, FRE 403, R, FN	
80:6–17				
81:10–18	R, 403, SPEC			
85:9–12	R, 403, OB, SPEC, V	85:20-22; 85:24- 86:1	V, FN, FRE 403, R	
88:24–89:19	R, 403, SPEC, OB	89:21-24; 90:1	V, O, FRE 403, R, L, FN, S	
90:4–21	R, 403, OB, SPEC			

Rule 30(b)(1) Deposition Designations Sandra Close				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
90:23–91:4	R, 403, IH, OB, SPEC			
94:18–95:11	R, 403, OB, SPEC, V			
95:15–97:12	403			
97:13–22	403			
99:4–16	R, 403, CP, F, H, OB, V			
99:18–23	R, 403, OB, V			
99:25–101:9	R, 403, I, MIS, OB, V	101:19-20; 101:22-24	FRE 403, R, V, FN	
102:2–15	R, 403, OB, SPEC, V			
102:25–104:6	R, 403, OB, SPEC	104:8-9; 104:11- 18; 104:20-105:3; 105:6-14; 106:10- 11; 106:13-21	FN, L, O, FRE 403, R, V, S	
113:13– 114:10	R, 403			
120:13–20	R, 403			
121:4–20	R, 403, OB, SPEC			
121:22– 122:20	R, 403, OB, SPEC			
122:22–123:7	R, 403, OB, SPEC			
135:14– 138:13	R, 403, OB, SPEC, V			
143:17–145:5	R, 403, SPEC, V	145:6-8; 145:11- 15	S, FRE 403, R, FN, V	
145:19–20				
146:16– 147:25	R, 403, SPEC			
154:10–155:1	R, 403, SPEC	155:3-5; 155:8- 156:3	S, V, FRE 403, R, FN	
156:6–158:7	R, 403, SPEC, OB, V			

Rule 30(b)(1) Deposition Designations Sandra Close				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Natera's Objections to Defendants' Counter-Designation	Ruling
164:12–165:14	R, 403, SPEC, OB, V	165:16-166:1	O, L, S, FRE 403, R, FN	
168:9–169:8	R, 403, SPEC, OB, V			
169:21–170:6	R, 403, H, V			
171:7–172:22	R, 403, SPEC, OB, V	172:23-25; 173:2-6; 173:10-13	FN, V, FRE 403, R, S	
177:18–25	R, 403, F, V	172:9-25; 173:2-6; 173:10-13	FN, V, FRE 403, R, S	
178:7–12	R, 403, F, V	172:9-25; 173:2-6; 173:10-13	FN, V, FRE 403, R, S	
179:2–15	R, 403, SPEC, V	172:9-25; 173:2-6; 173:10-13; 179:17-18; 179:20-21	FN, V, FRE 403, R, S, AF	
180:9–181:20	R, 403, OB, PK, SPEC, V	172:9-25; 173:2-6; 173:10-13	FN, V, FRE 403, R, S	
183:17–24	R, 403, AA, CP, F, OB, PK, SPEC, V	172:9-25; 173:2-6; 173:10-13; 180:16-181:1; 181:3-4; 182:22-24; 183:2-6	FN, V, FRE 403, R, S, L, O, AF, FRE 105	
184:13–185:5	R, 403, OB, NR, PK, SPEC, V			

Rule 30(b)(6) Deposition Designations Robert Costa				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
7:12–15				
11:2–19				
11:25–12:11	I; MIS; R; 403			
12:20–25				
15:8–22				
15:23–16:9	OB; BTS; R; 403	16:11-12; 16:15-18	FRE 403, R	
17:11–14	OB; BTS; R; 403	17:16-17; 17:20; 17:22; 17:25; 18:14-15; 18:18-20	FRE 403, R, S	
21:25–22:6	OB; BTS; R; 403; H	22:8; 22:11-14; 26:5-6; 26:9	FRE 403, R	
23:17–21	OB; BTS; R; 403			
24:4–25:22	OB; BTS; R; 403			

Rule 30(b)(6) Deposition Designations Robert Daber				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
16:12-17:19	LW; OB; BTS; 403; R; SPEC	15:25-16:4; 16:6-10	R, FRE 403	
20:8-21:15	LW; OB; BTS; 403; R; SPEC	21:17-20; 21:22-23; 21:25-1; 22:3-7	R, FRE 403, S	
30:22-31:9	LW; OB; BTS; 403; R	32:17-33:17	R, FRE 403, S, FN	
31:13-24	LW; OB; BTS; 403; R	32:17-33:17	R, FRE 403, S, FN	
41:7-43:8	LW; OB			
44:4-9	LW; OB; BTS; 403; R; V			
45:9-46:24	LW; OB; NARR; MIS; BTS; 403; R; V			
47:12-48:8	LW; OB; SPEC; BTS; 403; R	47:3-5; 47:7- 10; 48:14-15; 48:17-22; 48:24-49:2; 49:4-10	R, FRE 403, S	
49:12-50:15	LW; OB; BTS; 403; R; V	48:14-15; 48:17-22; 48:24-49:2; 49:4-10	R, FRE 403	
50:22-51:8	LW; I; BTS; 403; R			
52:22-54:5	LW; OB; BTS; 403; R			
57:5-16	LW; I; SPEC; BTS; 403; R	57:2-3; 57:17- 21; 57:23-25	R, FRE 403	
58:4-15	LW; OB; SPEC; BTS; I; 403; R	58:2		
58:16-62:5	LW; OB; BTS; 403; R			
62:22-25	LW			
69:5-72:10	LW; OB; BTS; SPEC; 403; R			
73:5-74:22	LW; OB; BTS; SPEC; 403; R			

Rule 30(b)(6) Deposition Designations Robert Daber				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
77:20-79:11	LW; OB; BTS; SPEC; 403; R			
80:4-82:15	LW; OB; F; BTS; SPEC; 403; R			
87:6-25	LW; OB			
88:10-89:3	LW; 403; R			
91:13-92:6	LW; OB; SPEC; 403; R; BTS			
92:8-93:12	LW; OB; SPEC; BTS; 403; R			
93:14-94:7	LW; AA; BTS; 403; R; SPEC; F			
94:9-95:4	LW; AA; F; BTS; 403; R			
95:11-24	LW; BTS; 403; R; SPEC			
96:4-20	LW; OB; I; BTS; SPEC; 403; R			
97:18-98:2	LW; OB; BTS; 403; R			
98:4-19	LW; OB; BTS; P; 403; R			
99:4-25	LW; OB; P; BTS; 403; R			
100:5-101:14	LW;OB; BTS; 403; R			
101:16-25	LW;; OB; BTS; 403; R			
103:8-21	LW; OB; BTS; 403; R			
104:5-14	LW; OB; BTS; 403; R			
104:16-21	LW; BTS; 403; R			
119:11-17	LW; I; V; BTS; 403; R			

Rule 30(b)(6) Deposition Designations Robert Daber				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
121:24-122:12	LW; SPEC; 403; R			
122:17-123:6	LW; OB; BTS; 403; R; SPEC			
126:20-127:11	LW; OB; BTS; 403; R			
139:16-19	LW; F	139:20-21	R, FRE 403	
149:25-14	LW; F; OB; BTS; 403; R; SPEC	139:20-21	R, FRE 403	
150:5-24	LW; F; OB; BTS; 403; R; SPEC	139:20-21	R, FRE 403	
151:13-153:6	LW; F; OB; BTS; 403; R; SPEC	139:20-21	R, FRE 403	
157:20-22	LW; I; BTS; 403; R	157:7-10; 157:12-18; 157:24-158:6	R, FRE 403	
158:8-20	LW; BTS	157:24-158:6	R, FRE 403	
172:16-173:8	LW; OB; NARR; BTS; 403; R			
181:4-184:3	LW; OB; BTS; 403; R; F			
185:5-11	LW; BTS; 403; R			
188:6-13	LW; F; BTS	188:17-20	R, FRE 403	
203:10-204:4	LW; F; BTS; 403; R			
213:14-215:6	LW; OB; BTS; 403; R			

Rule 30(b)(1) Deposition Designations Todd Druley				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
7:18–23				
9:24–10:19	403			
10:20–11:13				
13:4–14:11				
15:19–16:6				
17:8–18:23	OB, F, V, 403, R			
18:17–23	V, 403, R, F			
22:17–24:15	OB, F, V, 403, R			
24:20–25:2	V, 403, R, I	24:17-19	R, FRE 403	
28:9–29:11	V, 403, R			
30:18–31:1	V, 403, R			
31:7–32:17	OB, F, SPEC, V, 403, R			
33:9–34:18	V, 403, R			
35:6–9	V, 403, R			
35:25–36:13	V, 403, R	36:14-15; 36:18; 36:20-22	R, FRE 403	
39:22–25	V, 403, R			
40:4–42:5	OB, F, SPEC, V, 403, R, I			
42:11–17	V, 403, R			
42:18–43:11	V, 403, R			
43:19–44:19	OB, F, SPEC, V, 403, R			
45:9–15	OB, F, SPEC, V, 403, R			
46:25–47:24	OB, F, V, 403, R			
53:10–17	403, R, F	53:18-19	R, FRE 403	
54:24–55:4	403, R, F			
55:16–24	403, R, F			
64:2–66:4	OB, F, 403, R			
66:20–67:8	OB, F, SPEC, V, 403, R			
67:10–68:18	OB, F, SPEC, V, 403, R			
72:19–73:11	V, 403, R			
74:19–75:5	OB, F, V, 403, R			
81:16–20	403, R			

Rule 30(b)(1) Deposition Designations Todd Druley				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
82:2-15	403, R			
83:17-84:23	403, R			
85:2-15	403, R, F	82:16-19	R, FRE 403, C	
85:23-25	403, R			
86:4-16	403, R	86:17-25	R, FRE 403, S	
89:19-90:3	OB, F, SPEC, V, 403, R	90:5-6	R, FRE 403, C	
92:5-14	OB, F, V, 403, R	92:16-25	R, FRE 403	
93:13-94:8	OB, F, V, 403, R	94:9-12; 94:15-18	R, FRE 403, S	
94:20-95:4	OB, F, CP, V, 403, R	94:9-12; 94:15-18	R, FRE 403, S	
96:8-11	V, 403, R	96:12-15	R, FRE 403, C	
97:10-15				
97:18-98:2	V, 403, R, F	98:3-5	R, FRE 403	
98:24-99:12	OB, F, V, 403, R	99:13-16; 99:19- 25	R, FRE 403	
101:8-103:2	OB, F, V, 403, R			
104:16-23	OB, F, V, 403, R			
105:5-12	OB, F, V, 403, R	105:14-17; 105:19-106:1; 106:3-12	R, FRE 403, C	
106:13-22	I, V, 403, R	105:14-17; 105:19-106:1; 106:3-12	R, FRE 403, C	
117:14-17				
118:8-119:18	V, 403, R			
120:9-121:12	OB, F, V, 403, R			
125:12-15				
125:18-126:18	403, R, V			
128:6-130:3	OB, 403, R, V	127:16-128:5	R, FRE 403, C	
130:4-7				
130:10-20	OB, 403, R, V			
130:10-136:15	OB, 403, R, V			
130:22-134:18	OB, 403, R, V			
134:19-135:18	OB, 403, R, V			
135:22-136:15	OB, 403, R, V	136:16-22	R, FRE 403, C	
136:23-137:2				

Rule 30(b)(1) Deposition Designations Todd Druley				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
137:7–13	403, R, V			
140:15–25	OB, F, 403, R, V			
141:1–5				
142:9–14	OB, F, 403, R, V	141:12-15	R, FRE 403	
142:15–18				
142:21–143:2	403, R, V			
143:6–25	403, R, V			
144:14–25	403, R, V			
145:9–146:1	403, R, V, F, OB			
146:10–13				
146:16–22	403, R, V			
147:16–149:11	403, R, V, H	149:12-17	R, FRE 403, C	
149:18–20				
149:23–150:6	403, R, V			
150:13–151:1	403, R, V: OB			
153:4–8				
153:12–155:8	403, R, V			

Rule 30(b)(6) Deposition Designations Darren Fogg				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
6:17-20				
28:4-31:17	OB; BTS; F; BTS;			
30:7-31:3				
37:9-12	I; R; BTS			
37:25-38:7	I; R; BTS			
40:23-41:9	OB; BTS	40:10-13; 40:16- 21; 41:10-13	R, FRE 403, C, S	
43:19-44:24	OB; BTS			
74:6-76:2	403; SPEC	76:3-7; 76:10-19; 76:21-24; 77:1-20	R, FRE 403, C, S, FN, O	
102:14-103:8	OB; SPEC; BTS; R			
106:21-107:23	OB; SPEC; BTS; R			
110:23-111:19		74:6-76:7; 76:10- 19; 76:21-24; 77:1-20	R, FRE 403, C, S, FN, O	
114:19-115:7	OB; BTS; LC; R; SPEC			
115:9-20	OB; BTS			
115:22-116:8	OB; BTS; LC	74:6-76:7; 76:10- 19; 76:21-24; 77:1-20	R, FRE 403, C, S, FN, O	
117:1-14				
123:13-125:9				
127:1-11				
131:22-132:16				
146:23-147:25				
161:15-163:16				
163:24-165:6				
167:6-168:1				
173:14-174:16	I; 403			
175:1-9	I; 403	175:11-21	R, FRE 403, C	
175:22-177:3	OB; I; 403	177:6-9	R, FRE 403, C	
182:11-23				
182:25-183:8				

Rule 30(b)(6) Deposition Designations Darren Fogg				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Natera's Objections to Defendants' Counter-Designation	Ruling
183:12-185:17	OB; SPEC; BTS	185:20-21	R, FRE 403, C	
186:13-187:20	I; BTS; 403	186:7-12; 227:18-229:7	R, FRE 403, C	
187:21-189:13	BTS; 403	227:18-229:7	R, FRE 403, C	
189:16-191:9	BTS; 403; I	191:12-17	R, FRE 403, C	
201:11-203:21	OB; BTS; SPEC; R; 403	217:4-8; 217:10-13; 217:15-22; 217:24-25; 218:1-18	R, FRE 403, C, S, ID	
210:11-20	I; 403; V; F; SPEC			
216:13-16	I; 403	216:17-24	R, FRE 403, C	
223:13-225:5	OB; BTS; 403; R; SPEC			
248:5-249:17	403; R			
251:16-253:23	403; R			
255:24-257:8	I; 403; R; BTS; SPEC	255:10-23	R, FRE 403, C, FN	
261:1-12	I; 403; R			
265:6-266:21	I; 403; R			
267:3-15	403; R; SPEC; BTS	267:25-268:10; 272:14-273:4; 277:5-23	R, FRE 403, C, ID	
270:5-13	403; R; SPEC; BTS	267:25-268:10; 272:14-273:4; 277:5-23	R, FRE 403, C	
270:15-272:5	403; R; SPEC; BTS	267:25-268:10; 272:14-273:4; 277:5-23	R, FRE 403, C	
273:17-274:23				
274:10-275:10	I; 403; R; F	275:18-25	R, FRE 403, C	
276:1-19	OB; I; 403; R	276:20-277:2	R, FRE 403, C, S	
278:20-280:1	403; R			
283:7-24	OB; 403; R; I			

Rule 30(b)(6) Deposition Designations Darren Fogg				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
284:10-17	403; R			
284:18-285:21				
288:16-289:12	I; 403; R; SPEC; F	295:12-20	R, FRE 403, C	
302:19-303:2				
305:23-308:21	403; R; V			
311:13-312:11	403; R			
313:12-314:1	OB; 403; R; V; F; BTS; MIS	295:12-20; 296:1-3; 296:6-12; 296:16; 296:18-21; 314:4:-7; 314:10-25; 315:12-14; 315:16-316:6; 316:9-10; 316:15-25	R, FRE 403, C, OBJ	
315:1-10	OB; 403; R; V; F; BTS; MIS	295:12-20; 296:1-3; 296:6-12; 296:16; 296:18-21; 314:4:-7; 314:10-25; 315:12-14; 315:16-316:6; 316:9-10; 316:15-25	R, FRE 403, C, OBJ	
318:1-319:4	403; R			
321:22-322:20	403; R; NARR; SPEC; F; BTS; MIS			
337:14-338:14	403; R; I;			
338:3-16	OB; 403; R; F			
340:22-341:19	OB; 403; R			
342:6-344:3	OB; 403; R			

Rule 30(b)(6) Deposition Designations Dr. Sunny Gilbert				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
10:17–23				
11:5–8				
13:14–14:4	403			
15:20–16:18				
16:24–17:2				
17:13–18:11	OB; F; BTS; NARR; SPEC			
18:12–19:14				
21:3–17	OB			
21:22–22:20				
22:23–23:15				
23:16–24:6				
24:16–25:3				
25:6–23	OB; F			
26:2–7				
26:18–27:6				
27:7–20				
27:23–28:13				
28:16–29:20				
29:23–30:13	OB; F; SPEC			
30:16–31:3				
31:6–17				
31:20–32:12				
32:15–33:3	OB; F; SPEC			
33:6–20	OB; F; SPEC			
33:23–34:11	OB; F; SPEC			
34:15–35:1	OB; F; SPEC	35:2–3	FRE 403, R	
37:3–20	OB; F; SPEC			

Rule 30(b)(6) Deposition Designations Timothy Holwick August 17, 2021				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
17:5–15	R, 403, BTS, V			
17:25–18:16	R, 403, OB, PK, SPEC, V			
20:20–21:1	R, 403, I, PK, SPEC, V	20:14-19; 21:22- 24; 22:1-23:7; 44:6-8	FRE 403, R, FN, S	
21:2–19	R, 403, BTS, I, PK, SPEC, V	21:22-24; 22:1- 23:7; 44:6-8	L, O, FRE 403, R, FN, S	
33:13–23	R, 403, I, SPEC, V	33:24-34:1	FRE 403, R, FN, S	
34:2–5	R, 403, I, SPEC, V	34:6	FRE 403, R, FN, S	
36:25–37:13	R, 403, BTS, I, PK, V	36:1-6; 36:18-24	SC, FN, FRE 403, R, S, ID	
37:16				
37:18–38:4	R, 403, I, SPEC, V			
38:16–39:13	R, 403, F, I, OB, SPEC, V	39:15-40:16	FN, FRE 403, R, S, L, O	
47:15–48:19				
53:4–54:18	R, 403, BTS, H, OB, PK, SPEC, V			
79:11–16	R, 403, I, OB, V	78:21; 78:23- 79:9; 79:17-80:9; 80:11-13; 80:16- 81:hb2; 81:4-7; 81:9-11; 210:9- 12; 210:14-15	SC, V, FN, ID, L, O, S, FRE 403, R	
86:8–13	I	86:16-20	FRE 403, R	
87:2–21	R, 403, BTS, I, H, OB, SPEC, V	86:16-20	FRE 403, R	
92:18–21	R, 403, F, I, PK, SPEC, V	86:16-20; 90:17- 20; 91:8-9; 91:12; 93:21-94:16	FRE 403, R, FN, S, V, SC	
92:24–93:6	R, 403, I, PK, SPEC, V	93:17-18; 90:17- 20; 93:21-94:16	FRE 403, R, FN, S, V, SC	

Rule 30(b)(6) Deposition Designations Timothy Holwick August 17, 2021				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
94:18–24	R, 403, I, SPEC, V	94:25-95:1; 95:3-15	FRE 403, R, FN, F, S, V, SC	
95:17–25	R, 403, I, SPEC, V	96:5-12	FRE 403, R	
96:2–5	R, 403, I, SPEC, V	96:5-12	FRE 403, R	
97:12–98:22	R, 403, BTS, I, PK, SPEC, V	98:24-25	ID, FRE 403, R, FN, F, S	
100:20–25	R, 403, I, V	98:24-25	ID, FRE 403, R, FN, S	
101:3–20	R, 403, H, I, OB, PK, SPEC, V	98:24-25	ID, FRE 403, R, FN, S	
103:23–24	R, 403, I, PK, SPEC, V	98:24-25; 103:22	ID, FRE 403, R, FN, S, OBJ	
104:2–4	R, 403, I, PK, SPEC, V	98:24-25; 103:22	ID, FRE 403, R, FN, S, OBJ	
104:6–10	R, 403, H, I, V	98:24-25	ID, FRE 403, R, FN, S	
104:20–23	R, 403, H, I, PK, SPEC, V	98:24-25; 105:1-3; 105:8-23; 109:4-8; 109:10	ID, FRE 403, R, FN, S, OBJ	
105:4–8	R, 403, I, PK, SPEC, V	98:24-25; 105:1-3; 105:8-23; 109:4-8; 109:10	ID, FRE 403, R, FN, S, SC, OBJ	
105:25–106:2	R, 403, H, I, PK, SPEC, V	98:24-25	ID, FRE 403, R, FN, S	
106:5–8	R, 403, H, I, PK, SPEC, V	98:24-25; 106:10-107:3	ID, FRE 403, R, FN, S, SC	
107:4–109:3	R, 403, I, V	98:24-25; 106:10-107:3	ID, FRE 403, R, FN, S, SC	
109:14–20	R, 403, BTS, H, I, PK, SPEC, V	98:24-25	ID, FRE 403, R, FN, S	
109:23–110:12	R, 403, BTS, I, PK, SPEC, V	98:24-25; 110:19-111:6	ID, FRE 403, R, FN, S, SC	
111:12–19	R, 403, BTS, I, OB, PK, SPEC, V	98:24-25	ID, FRE 403, R, FN, S	

Rule 30(b)(6) Deposition Designations Timothy Holwick August 17, 2021				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
111:21–112:8	R, 403, I, OB, PK, SPEC, V	98:24-25	ID, FRE 403, R, FN, S	
112:9–114:2	R, 403, BTS, H, OB, V	114:23-24; 115:2- 6; 115:9-10; 121:4-25	C, SC, L, O, FN, MIS, FRE 403, R,	
118:17–20	R, 403, BTS, LC, V	114:23-24; 115:2- 6; 115:9-10; 121:4-25	C, SC, L, O, FN, MIS, FRE 403, R,	
118:25–119:2	R, 403, BTS, LC, V	114:23-24; 115:2- 6; 115:9-10; 121:4-25	C, SC, L, O, FN, MIS, FRE 403, R,	
119:4–17	R, 403, BTS, H, I, V	119:18-19; 119:23-120:13; 121:4-25	C, SC, L, O, FN, MIS, FRE 403, R,	
122:1–20	R, 403, BTS, H, LC, MIS, V			
122:24–123:2	R, 403, BTS, H, LC, MIS, V			
127:22–128:18	R, 403, BTS, I, LC, OB, PK, V	128:24-129:4	FRE 403, R, S	
129:5–130:6	R, 403, BTS, I, OB, PK, V	128:24-129:4; 130:7-131:6	FRE 403, R, S, FN	
131:8–14	R, 403, BTS, I, PK, V	128:24-129:4	FRE 403, R, S	
140:9–141:6	R, 403, BTS, H, I, OB, PK, V	128:24-129:4	FRE 403, R, S	
143:20–144:6	R, 403, BTS, F, OB, SPEC, V			
147:15–19	R, 403, BTS, V			
148:4–149:12	R, 403, BTS, V			
159:20–23	R, 403, BTS, OB, V			
167:17–168:1	R, 403, BTS, I, V	165:5-7; 165:9- 168:3; 210:9-12; 210:14-15	S, FN, FRE 403, R, V, ID	
172:16–22	R, 403, I, V	172:5-6; 172:8- 15; 172:23- 173:10	S, FN, FRE 403, R, V	

Rule 30(b)(6) Deposition Designations Timothy Holwick August 17, 2021				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
174:20–175:1	R, 403, BTS, I, PK, SPEC, V	174:1-12; 174:14- 19	FN, FRE 403, R, S	
190:10–14	R, 403, I, V	185:3-5; 185:7	FRE 403, R, OBJ	
191:6–10	R, 403, BTS, I, OB, SPEC, V	185:3-5; 185:7; 210:9-12; 210:14- 15	FRE 403, R, OBJ	
191:12–17	R, 403, F, H, I, V	148:13-24	FRE 105, FRE 403, R	
197:10–25	R, 403, OB, H, V	148:13-24; 198:1- 9	S, FN, FRE 403, R	
199:2–200:11	R, 403, BTS, H, I, OB, PK, SPEC, V	148:13-24; 200:18-20; 200:22-25	FRE 105, FRE 403, R	
200:6–11	R, 403, I, PK, SPEC, V	200:18-20; 200:22-25	FN, S, FRE 403, R,	
201:12–23	R, 403, I, OB, V	200:18-20; 200:22-25; 210:9- 12; 210:14-15	FN, S, FRE 403, R	
202:11–18	R, 403, OB, V			
204:17–24	R, 403, OB, V	205:2-3; 205:5; 210:17-19; 210:21-25; 211:21-23; 211:25-212:3	FN, S, O, L, FRE 403, R	
205:7–14	R, 403, BTS, I, OB, SPEC, V	205:2-3; 205:5; 205:15-206:10; 207:2-23; 210:9- 12; 210:14-15; 210:17-19; 210:21-25; 211:21-23; 211:25-212:3	S, FN, S, O, L, FRE 403, R	
207:24–208:2	R, 403, BTS, F, I, IH, PK, SPEC, V	207:2-23; 208:12- 21; 210:9-12; 210:14-15; 210:17-19; 210:21-25;	S, FN, S, O, L, FRE 403, R	

Rule 30(b)(6) Deposition Designations Timothy Holwick August 17, 2021				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
		211:21-23; 211:25-212:3		
208:5–11	R, 403, BTS, F, I, IH, PK, SPEC, V	207:2-23; 208:12- 21; 210:9-12; 210:14-15; 210:17-19; 210:21-25; 211:21-23; 211:25-212:3	S, FN, S, O, L, FRE 403, R	
208:23–24	R, 403, BTS, I, SPEC, V	209:5-6; 209:9-24	FRE 403, R	
209:1–3	R, 403, BTS, I, SPEC, V	209:5-6; 209:9-24	FRE 403, R	
211:2–4	R, 403, BTS, F, I, SPEC, V	210:9-12; 210:14- 15	FRE 403, R	
211:6–10	R, 403, BTS, I, OB, SPEC, V	210:9-12; 210:14- 15	FRE 403, R	
212:5–20	R, 403, BTS, I, OB, SPEC, V	210:9-12; 210:14- 15; 211:21-23; 211:25-212:3	FRE 403, R	
213:25–214:5	R, 403, BTS, I, SPEC, V	211:21-23; 211:25-212:3; 212:22-213:24; 214:5-215:8	FRE 403, R, FN, L, O	
215:10–17	R, 403, BTS, I, OB, PK, SPEC, V	215:9	FRE 403, R, OBJ	
215:19–24	R, 403, BTS, I, OB, SPEC, V	211:21-23; 211:25-212:3; 215:24-216:3	FRE 403, R, FN. L, O	
216:5–217:5	R, 403, BTS, I, LC, OB, SPEC, V	211:21-23; 211:25-212:3	FRE 403, R, FN, S	
217:6–15	R, 403, BTS, OB, V			
219:5–9	R, 403, BTS, PK, SPEC, V			

Rule 30(b)(6) Deposition Designations Timothy Holwick August 17, 2021				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
221:20–222:2	R, 403, BTS, F, OB, V			
222:4–223:12	R, 403, BTS, F, OB, SPEC, V			
230:14–231:15	R, 403, BTS, H, I, OB, PK, SPEC, V	148:13-24	FRE 105, FRE 403, R	
231:16–232:22	R, 403, BTS, F, H, V			
234:13–235:22	R, 403, BTS, H, I, OB, V	235:24-236:1; 236:4-6; 236:8- 10; 236:13-237:4; 237:6-13	SC, FN, L, O, FRE 403, R	
237:19–21	R, 403, BTS, H, I, V	235:24-236:1; 236:4-6; 236:8- 10; 236:13-237:4; 237:6-13	SC, FN, L, O, FRE 403, R	
237:23–238:3	R, 403, BTS, H, I, V	235:24-236:1; 236:4-6; 236:8- 10; 236:13-237:4; 237:6-13	SC, FN, L, O, FRE 403, R	
240:14–15	R, 403, BTS, F, LC, SPEC, V			
240:18–241:2	R, 403, AA, BTS, LC, OB, SPEC, V			
245:14–246:3	R, 403, AA, BTS, OB, PK, SPEC, V			
254:1–256:10	R, 403, H, OB, V			
263:16–22	R, 403, I, PK, SPEC	264:2-5	FRE 403, R, S	
264:6–22	R, 403, BTS, I, H, OB, PK, SPEC	264:2-5	FRE 403, R, S	
265:16–23	R, 403, OB, V			
265:25–266:5	R, 403, OB, PK, V			

Rule 30(b)(6) Deposition Designations Timothy Holwick August 17, 2021				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
266:7–269:12	R, 403, BTS, H, I, OB, MIS, PK, SPEC, V	264:2-5	FRE 403, R, S	
268:4–5	R, 403, V			
271:13–21	R, 403, H, I, V	210:9-12; 210:14-15; 264:2-5; 271:22-25	FRE 403, R, FN, S	
272:21–273:8	R, 403, H, I, OB, SPEC, V	264:2-5	FRE 403, R, S	
273:18–275:7	R, 403, H, I, MIS, OB, SPEC, V	264:2-5	FRE 403, R, S	
275:18-276:1	R, 403, H, I, MIS, OB, SPEC, V	264:2-5	FRE 403, R, S	
276:3–11	R, 403, H, I, MIS, V	264:2-5	FRE 403, R, S	
276:19–277:3	R, 403, H, I, MIS, V	264:2-5	FRE 403, R, S	
277:5–16	R, 403, H, I, MIS, OB, V	264:2-5	FRE 403, R, S	
282:1–283:11	R, 403, AA, BTS, F, H, I, MIS, OB, PK, SPEC, V	283:13-14; 283:16-19; 283:21; 284:4-5; 284:7	SC, L, FRE 403, R, FN	
284:9-12	R, 403, BTS, F, I, OB, V	283:13-14; 283:16-19; 283:21; 284:4-5; 284:7	SC, L, FRE 403, R, FN	
284:14–25	R, 403, BTS, I, OB, V	283:13-14; 283:16-19; 283:21; 284:4-5; 284:7	SC, L, FRE 403, R, FN	
285:2–9	R, 403, BTS, I, OB, V	283:13-14; 283:16-19; 283:21; 284:4-5; 284:7	SC, L, FRE 403, R, FN	

Rule 30(b)(6) Deposition Designations Timothy Holwick August 17, 2021				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
285:11–22	R, 403, BTS, I, OB, V	283:13-14; 283:16-19; 283:21; 284:4-5; 284:7	SC, L, FRE 403, R, FN	
285:24–286:3	R, 403, BTS, I, V	283:13-14; 283:16-19; 283:21; 284:4-5; 284:7	SC, L, FRE 403, R, FN	
286:9–10	R, 403, BTS, I, V	283:13-14; 283:16-19; 283:21; 284:4-5; 284:7; 286:11-17	SC, L, FRE 403, R, FN	
286:16	R, 403, BTS, I, V	283:13-14; 283:16-19; 283:21; 284:4-5; 284:7; 286:11-17	SC, L, FRE 403, R, FN	

Rule 30(b)(6) Deposition Designations Timothy Holwick December 1, 2021				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
295:5-10				
296:5-9	V			
296:19-297:1	R, 403, V			
300:8-301:7	R, 403, MIS, OB, SPEC, V	308:4-6; 308:9-16	FRE 403, R	
302:18-24	R, 403, I, OB, V	302:25-303:4; 303:8-9; 303:11- 18	FN, FRE 403, R	
304:18-23	R, 403, I, OB, V	303:8-9; 303:11- 18	FN, FRE 403, R	
304:25-305:1	R, 403, BTS, PK, SPEC, V			
305:3	R, 403, BTS, PK, SPEC, V			
305:9-13	R, 403, BTS, PK, SPEC, V			
308:18-309:15	R, 403, BTS, OB, PK, SPEC, V			
319:15-20	R, 403, BTS, OB, SPEC, V	319:3-5; 319:8-13	SC, FRE 403, R	
325:22-24	R, 403, V			
326:1	R, 403, V			
326:3-5	R, 403, V			
326:7	R, 403, V			

Rule 30(b)(6) Deposition Designations John Iafrate, M.D., Ph.D.				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
7:14–8:8				
10:14–11:6				
13:13–14:12				
18:10–19:10	R, 403, V			
19:11–20:22	R, 403, V			
21:11–14	R, 403, V			
21:25–23:4	R, 403, V			
23:5–23	R, 403, PK, SPEC, V			
25:4–12	R, 403, F, SPEC, V	25:13-25; 26:7- 27:9	FN, FRE 403, R	
26:1–6	R, 403, F, SPEC, V	25:13-25; 26:7- 27:9	FN, FRE 403, R	
28:2–29:2	R, 403, PK, SPEC, V	29:3-4; 29:18- 30:16	L, O, FRE 403, R	
30:18–32:1	R, 403, F, I, PK, NR, V	29:3-4; 29:18- 30:16; 32:2-9	L, O, FRE 403, R, S	
33:4–20	R, 403, I, NR, PK, SPEC, V	32:10-33:2	FN, L, O, FRE 403, R, S	
34:9–22	R, 403, V			
36:19–37:3	R, 403, F, PK, SPEC, V			
37:11–39:9	R, 403, F, PK, SPEC, V			
39:10–40:15	R, 403, PK, V	40:16-24; 41:4; 41:9-43:3; 43:9; 43:11-19; 46:1- 16; 46:19-22	FRE 403, R, FN, L, O, S	
43:20–44:1	R, 403, V	41:9-43:3; 43:9; 43:11-19	FRE 403, R, FN, L, O, S	
47:6–49:15	R, 403, F, PK, SPEC, V	46:1-16; 46:19- 22; 50:4-51:14; 51:16-52:15; 146:23-147:2	FRE 403, R, FN, L, O, S	
52:20–24	R, 403, F, SPEC, V			

Rule 30(b)(6) Deposition Designations John Iafrate, M.D., Ph.D.				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
53:1-2	R, 403, F, SPEC, V			
53:4-25	R, 403, F, PK, SPEC, V			
60:1-8	R, 403, F, OB, PK, SPEC, V	58:13-59:11	ID, FRE 403, R, S, FN	
60:10-62:19	R, 403, F, O, OB, PK, SPEC, V	58:13-59:11	ID, FRE 403, R, S, FN	
63:2-13	R, 403, F, I, PK, SPEC, V, MIL	62:21-63:2	FRE 403, R, S, OBJ	
64:7-65:5	R, 403, F, I, PK, SPEC, V, MIL	65:6-10; 65:19-21	FRE 403, R, S, FN	
65:11-19	R, 403, PK, SPEC, V, MIL			
65:23-66:14	R, 403, F, OB, PK, SPEC, V, MIL			
66:18				
67:2-10	R, 403, F, I, OB, PK, SPEC, V, MIL			
67:14-19	R, 403, I, PK, SPEC, V, MIL	67:19-23	FRE 403, R, S, FN, OBJ	
68:6-18	R, 403, F, PK, SPEC, V			
69:4-70:25	R, 403, F, PK, SPEC, V			
71:2-5	R, 403, V	71:6-23	FN, FRE 403, R, L, O, S	
72:1-12	R, 403, PK, V			
72:14-19	R, 403, F, OB, PK, SPEC, V			
72:21-73:2	R, 403, F, OB, PK, SPEC, V			
73:4-11	R, 403, F, OB, PK, SPEC, V			
73:15-23	R, 403, F, I, OB, PK, SPEC, V	73:23-74:6	FRE 403, R, FN, S	

Rule 30(b)(6) Deposition Designations John Iafrate, M.D., Ph.D.				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
74:7–23	R, 403, F, PK, SPEC, V			
75:8–76:2	R, 403, F, SPEC, V			
77:25–79:16	R, 403, F, PK, SPEC, V			
80:15–81:14	R, 403, F, I, OB, PK, SPEC, V	80:8-14	FRE 403, R, FN, L, O, S	
81:23–84:3	R, 403, F, I, PK, SPEC, V	84:4-86:12	FRE 403, R, FN, L, O, S	
86:13–19	R, 403, F, I, PK, SPEC, V	86:22-24	FRE 403, R, FN, L, O, S	
86:24–87:3	R, 403, PK; I			
87:5–88:22	R, 403, F, CP, LC, OB, PK, SPEC, V			
88:24–89:4	R, 403, CP, F, PK, SPEC, V			
89:10–22	R, 403, PK, SPEC, V	89:23-90:1	FRE 403, R, FN, AF	
90:2–4	R, 403, V			
90:5–97:19	R, 403, F, H, I, PK, SPEC, V	97:20-99:14	FRE 403, R, FN, L, O, S	
99:16–19	R, 403, H, SPEC, V			
100:1–102:14	R, 403, F, H, PK, SPEC, V			
102:15–103:15	R, 403, H, V			
103:16–17	R, 403, V			
103:19–25	R, 403, H, V			
104:1–2	R, 403, F, I, H, PK, SPEC, V	104:1; 104:3-13; 104:16-21	FRE 403, R, FN, S, OBJ	
104:14–15	R, 403, V	104:1; 104:3-13; 104:16-21	FRE 403, R, FN, S, OBJ	
104:21	R, 403, PK, V			
104:22–106:18	R, 403, H, PK, SPEC, V			

Rule 30(b)(6) Deposition Designations John Iafrate, M.D., Ph.D.				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
106:21–107:2	R, 403, H, I, PK, SPEC, V	107:3-7	FRE 403, R, FN, S	
107:8–108:5	R, 403, H, MIS, V			
108:9	R, 403, V			
108:11–17	R, 403, PK, SPEC, V			
109:20–110:18	R, 403, H, SPEC, V			
111:17–113:4	R, 403, H, V			
113:5–6	R, 403, I, V	113:7-114:2; 114:9-115:3	FRE 403, R, FN, L, O	
114:3–8	R, 403, V			
116:20–117:18	R, 403, I, V	117:19-21	FRE 403, R, FN, V, S	
117:24–118:3	R, 403, V			
119:21–121:2	R, 403, I, PK, SPEC, V	118:11-119:20	L, O, FRE 403, R, V, S	
121:12–21	R, 403, I, SPEC, V	121:22-122:6	L, O, FRE 403, R, V, S	
122:7–124:6	R, 403, OB, PK, SPEC, V	124:8-17; 124:21- 125:3	L, O, FRE 403, R, FN, S	
125:5–126:2	R, 403, LC, OB, V	124:8-17; 124:21- 125:3	L, O, FRE 403, R, FN, S	
126:4–127:7	R, 403, SPEC, V	124:8-17; 124:21- 125:3; 127:8- 128:12	L, O, FRE 403, R, FN, S	
128:13–14	R, 403, LC, O, V	127:8-128:12	FRE 403, R, FN, S	
128:17–20	R, 403, PK, SPEC, V			
128:22–23				
129:10–130:12	R, 403, H, PK, SPEC, V			
130:21–132:14	R, 403, H, LC, O, PK, SPEC, V	127:8-128:12	FRE 403, R, FN, S	
132:15–133:23	R, 403, F, H, V			

Rule 30(b)(6) Deposition Designations John Iafrate, M.D., Ph.D.				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
133:24–135:2	R, 403, F, H, MIS, PK, SPEC, V			
135:4–25	R, 403, F, IH, PK, SPEC, V			
136:2–10	R, 403, PK, SPEC, V			
136:11–137:18	R, 403, I, PK, SPEC, V	137:19-138:15	L, O, FRE 403, R, FN, S	
138:16–142:7	R, 403, H, PK, SPEC, V			
142:22–143:1	R, 403, PK, SPEC, V	143:2-17	FRE 403, R, FN, S, L, O	
145:25–146:22	R, 403, LC, PK, SPEC, V	145:6-20; 145:23	FRE 403, R, FN, S, L, O	
147:22–148:13	R, 403, F, I, LC, O, PK, SPEC, V	148:14; 148:21- 22; 149:8-10	FRE 403, R, FN, S, V	
148:22–149:8	R, 403, PK, SPEC, V			
150:18–22	R, 403, I, PK, V	150:23-25	FRE 403, R, FN, S, V	
151:6–15	R, 403, ARG, I, PK, SPEC, V	151:6; 151:16-18; 151:22-152:5	AF, S, FN, FRE 403, R, OBJ	
152:7–153:7	R, 403, PK, SPEC, V			
154:10–22	R, 403, F, PK, SPEC, V	154:23-156:13	FN, FRE 403, R, L, O	
156:14–19	R, 403, F, PK, SPEC, I, V	154:23-156:13; 156:19-157:2	FN, FRE 403, R, L, O	
157:3–6	R, 403, F, V			

Third Party Deposition Designations Taylor Jensen, LabCorp				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
10:24–11:7				
13:11–18				
15:17–22				
16:17–22				
17:17–25				
18:4–11				
19:10–13				
28:9–16	OB			
30:20–31:4	OB			
31:6–16	OB			
32:7–18	OB			
32:22–33:8				
33:10–20				
54:22–56:2	OB; F; SPEC; V; 403; L			
60:19–61:11	F; V; 403			
64:19–65:7	OB; F; SPEC; V; 403			
65:20–25	F; SPEC; V; 403			
66:2–13	403; R			
67:17–68:10	F; SPEC; V; 403	69:15-17; 69:20- 22	R, FRE 403, S, FN	
69:24–70:5	F; SPEC; V; 403	69:15-17; 69:20- 22	R, FRE 403, S, FN	
70:15–71:1	F; SPEC; V; 403	69:15-17; 69:20- 22	R, FRE 403, S, FN	
72:22–73:16	OB; F; SPEC; V; 403			
73:18–19	F; V; 403; SPEC			
73:24–74:3	F; V; 403; SPEC			
75:19–25	I			
88:8–89:2	F; 403; R; BTS	89:19-20; 90:2-3	R, FRE 403	
114:16–21				
115:13–17	F; SPEC; 403; R	116:5-6; 116:10; 116:12-13; 116:17; 117:3-10; 117:13-18; 117:22	R, FRE 403, C, FN, S	

Third Party Deposition Designations Taylor Jensen, LabCorp				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Natera's Objections to Defendants' Counter-Designation	Ruling
120:4–17	OB; F; SPEC; L; LC; 403; R	116:5-6; 116:10; 116:12-13; 116:17; 117:3-10; 117:13-18; 117:22	R, FRE 403, C, FN, S	
120:25–121:13	OB; F; SPEC; L; LC; 403; R	116:5-6; 116:10; 116:12-13; 116:17; 117:3-10; 117:13-18; 117:22	R, FRE 403, C, FN, S	
121:15–122:17	OB; F; SPEC; L; LC; 403; R	116:5-6; 116:10; 116:12-13; 116:17; 117:3-10; 117:13-18; 117:22	R, FRE 403, C, FN, S	
125:4–19	OB; F; SPEC; L; LC; 403; R			
125:21–126:3	OB; F; SPEC; L; LC; 403; R	126:5-7; 126:12-13	R, FRE 403, C, , FN, S	
126:15–127:2	OB; F; SPEC; L; LC; 403; R			
127:4–14	OB; F; SPEC; L; LC; 403; R			
127:16–128:3	OB; F; SPEC; L; LC; 403; R			
128:5–17	OB; F; SPEC; L; LC; 403; R			
128:19–129:13	OB; F; SPEC; BTS; L			
129:15–130:12	OB; F; SPEC; BTS; L			
132:1–133:12	OB; F; SPEC; BTS			
133:24–135:17	OB; F; SPEC; BTS	140:13-16; 141:9-19; 141:24-142:3	R, FRE 403, C, S, O, ID, FN, S	
136:4–11	OB; F; SPEC; BTS	140:13-16; 141:9-19; 141:24-142:3	R, FRE 403, C, S, O, ID, FN, S	

Third Party Deposition Designations Taylor Jensen, LabCorp				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
137:2–10	OB; F; SPEC; BTS	137:12-15; 137:22-23; 140:13-16; 141:9- 19; 141:24-142:3	R, FRE 403, C, S, O, ID, FN, S	
138:12–21	OB; L; F; SPEC; H; 403; R; BTS			
139:1–17		140:13-16; 141:9- 19; 141:24-142:3	R, FRE 403, C, S, O, ID, FN, S	
143:15–144:5	OB; L; F; SPEC; H; 403; R			
144:7–21	OB; L; F; SPEC; H; 403; R	144:22-25; 145:16-19; 145:25; 146:4-5; 146:11; 146:13- 15; 146:21; 146:23-25; 147:6; 147:8-9; 147:15- 16	R, FRE 403, C, FN, S	
147:18–148:10	OB; L; F; SPEC; H; 403; R	144:22-25; 145:16-19; 145:25; 146:4-5; 146:11; 146:13- 15; 146:21; 146:23-25; 147:6; 147:8-9; 147:15- 16	R, FRE 403, C, FN, S	
150:9–15	403; R; H			
151:1–152:7	OB; L; F; SPEC; H; 403; R			
152:22–153:18	OB; L; F; SPEC; H; 403; R			
154:3–20	OB; L; F; SPEC; H; 403; R			
158:17–159:21	OB; F; SPEC; L; H; 403; R	157:20-158:8; 158:14-15; 161:17-19; 161:25-162:5; 162:18-20; 163:1;	R, FRE 403, C, ID, FN, S	

Third Party Deposition Designations Taylor Jensen, LabCorp				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Natera's Objections to Defendants' Counter-Designation	Ruling
		164:2-4; 164:10-18; 164:24		
162:6–16	OB; F; SPEC; L; H; 403; R	161:17-19; 161:25-162:5; 162:18-20; 163:1; 164:2-4; 164:10-18; 164:24	R, FRE 403, C, ID, FN, S	
163:5–24	OB; F; SPEC; L; H; 403; R	161:17-19; 161:25-162:5; 162:18-20; 163:1; 164:2-4; 164:10-18; 164:24	R, FRE 403, C, ID, FN, S	
166:16–168:18	OB; F; SPEC; L; H; 403; R	166:5-9; 166:15	R, FRE 403, S, FN	
169:6–14	OB; F; SPEC; V	169:16-18; 169:24	R, FRE 403, C, S, FN	
173:9–174:11	OB; F; SPEC; L; H; 403; R	174:13-16; 175:21-176:1; 176:4; 176:16-18; 176:22; 199:1-3; 199:9; 199:11-12; 200:4	R, FRE 403, C, FN, ID, S	
174:21–175:5	OB; F; SPEC; V	175:21-176:1; 176:4; 176:16-18; 176:22	R, FRE 403, C, FN, ID, S	
175:7–13		175:21-176:1; 176:4; 176:16-18; 176:22	R, FRE 403, C, FN, ID, S	
176:6–15	F; SPEC	175:21-176:1; 176:4; 176:16-18; 176:22; 177:15-17; 177:21-178:1; 178:5	R, FRE 403, C, FN, ID, S	
176:24–177:13	OB; F; SPEC	177:15-17; 177:21-178:1; 178:5	R, FRE 403, C, FN, ID, S	
178:7–16	OB; F; SPEC; V	177:15-17; 177:21	R, FRE 403, C, FN, ID, S	

Third Party Deposition Designations Taylor Jensen, LabCorp				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
179:23–180:21	OB; F; SPEC; V	177:15-17; 177:21	R, FRE 403, C, FN, ID, S	
181:9–19	OB; F; SPEC; V	182:11-13; 182:18	R, FRE 403, C, FN, ID, S	
181:22–182:9	OB; F; SPEC; V	183:20-23; 184:3	R, FRE 403, C	
182:20–183:18	OB; F; SPEC; V	177:15-17; 177:21	R, FRE 403, C, FN, ID, S	
184:5–19	OB; F; SPEC; V	177:15-17; 177:21	R, FRE 403, C, FN, ID, S	
190:20–191:18	OB; F; SPEC; V; L; 403; R; H	166:5-9; 166:15; 175:21-176:1; 176:4; 176:16-18; 176:22; 177:15- 17; 177:21-178:1; 178:5; 180:23-25; 181:5; 182:11-13; 182:18; 183:20- 23; 184:3; 184:21-24; 185:4; 185:6-7; 185:13; 185:15-16; 185:22-186:1; 186:7-9; 186:21- 22; 187:3-7; 187:13-18; 187:24-188:3; 188:19-21; 189:2- 6; 190:3-8; 190:11-12; 190:15-18	R, FRE 403, C, FN, ID, S	
198:15–22	403; R; H			
200:16–201:5	OB; F; V	199:1-3; 199:9; 199:11-12; 200:4	R, FRE 403, C	

Third Party Deposition Designations Taylor Jensen, LabCorp				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
202:5–204:19	OB; L; F; SPEC; 403; R	82:12-13; 82:21; 140:13-16; 141:9- 19; 141:24-142:3; 204:20-22; 204:25-205:1; 208:15-209:1; 209:5	R, FRE 403, C, FN, ID, S	
205:3–19	OB; L; F; SPEC; 403; R; V; H	82:12-13; 82:21; 140:13-16; 141:9- 19; 141:24-142:3; 204:20-22; 204:25-205:1; 208:15-209:1; 209:5	R, FRE 403, C, FN, ID, S	
205:20–207:3	OB; L; F; SPEC; 403; R; V; H	82:12-13; 82:21; 140:13-16; 141:9- 19; 141:24-142:3; 204:20-22; 204:25-205:1; 208:15-209:1; 209:5; 212:8-10; 212:16	R, FRE 403, C, FN, ID, S	
207:5–208:13	OB; L; F; SPEC; 403; R; V; H	82:12-13; 82:21; 140:13-16; 141:9- 19; 141:24-142:3; 204:20-22; 204:25-205:1; 208:15-209:1; 209:5; 212:8-10; 212:16	R, FRE 403, C, FN, ID, S	
209:7–16	OB; L; F; SPEC; 403; R; V; H	82:12-13; 82:21; 140:13-16; 141:9- 19; 141:24-142:3; 204:20-22; 204:25-205:1; 208:15-209:1; 209:5; 212:8-10; 212:16	R, FRE 403, C, FN, ID, S	

Third Party Deposition Designations Taylor Jensen, LabCorp				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
209:18–210:14	OB; L; F; SPEC; 403; R; V; H	82:12-13; 82:21; 140:13-16; 141:9- 19; 141:24-142:3; 204:20-22; 204:25-205:1; 208:15-209:1; 209:5; 212:8-10; 212:16	R, FRE 403, C, FN, ID, S	
210:16–211:6	OB; L; F; SPEC; 403; R; V; H	82:12-13; 82:21; 140:13-16; 141:9- 19; 141:24-142:3; 204:20-22; 204:25-205:1; 208:15-209:1; 209:5; 212:8-10; 212:16	R, FRE 403, C, FN, ID, S	
211:8–21	OB; L; F; SPEC; 403; R; V; H	82:12-13; 82:21; 140:13-16; 141:9- 19; 141:24-142:3; 204:20-22; 204:25-205:1; 208:15-209:1; 209:5; 212:8-10; 212:16	R, FRE 403, C, FN, ID, S	

Third Party Deposition Designations Yves Konigshofer, Ph.D., SeraCare				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Natera's Objections to Defendants' Counter-Designation	Ruling
9:6-9				
15:14-17:5				
22:11-24:9	OB; F; SPEC; 403; R; V	24:10-16; 47:12-14; 47:16-19; 47:21-24; 48:2-4; 48:6-7; 48:10-13; 48:15-16; 48:19-20; 48:22-49:8; 49:11-12	R, FRE 403, C, S, FN	
25:11-26:15	OB; F; SPEC; 403; R; V; L			
26:17-29:22	OB; F; SPEC; 403; R; V; L; H	32:2-3; 32:6; 47:12-14; 47:16-19; 47:21-24; 48:2-4; 48:6-7; 48:10-13; 48:15-16; 48:19-20; 48:22-49:8; 49:11-12; 133:5-8; 133:14-21; 133:24-134:5	R, FRE 403, C, S, FN	
31:5-13	F; SPEC; 403; R;	32:2-3; 32:6	R, FRE 403, C, S, FN	
34:2-40:4	OB; F; SPEC; 403; R; V; L; MIS; H	47:12-14; 47:16-19; 47:21-24; 48:2-4; 48:6-7; 48:10-13; 48:15-16; 48:19-20; 48:22-49:8; 49:11-12; 100:23-25; 101:1-3; 101:10-15	R, FRE 403, S, C, FN, AF	
40:21-41:22	OB; F; SPEC; L; 403; R; H	47:12-14; 47:16-19; 47:21-24; 48:2-4; 48:6-7; 48:10-13; 48:15-16; 48:19-20; 48:22-49:8; 49:11-12; 100:23-	R, FRE 403, S, C, FN, AF, ID	

Third Party Deposition Designations Yves Konigshofer, Ph.D., SeraCare				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
		25; 101:1-3; 101:10-15; 121:22-122:12		
42:5–11				
42:21–43:2				
44:7–46:6	OB; F; V; SPEC; L; 403; R; H	47:12-14; 47:16- 19; 47:21-24; 48:2-4; 48:6-7; 48:10-13; 48:15- 16; 48:19-20; 48:22-49:8; 49:11-12; 100:23- 25; 101:1-3; 101:10-15; 121:22-122:12	R, FRE 403, S, C, FN, AF, ID	
47:1–10	OB; L; V; SPEC; F	47:12-14; 47:16- 19; 47:21-24; 48:2-4; 48:6-7; 48:10-13; 48:15- 16; 48:19-20; 48:22-49:8; 49:11-12; 100:23- 25; 101:1-3; 101:10-15; 121:22-122:12	R, FRE 403, S, C, FN, AF, ID	
49:14–21	OB; F			
49:23–51:11	OB; F; SPEC; L; 403; R; H; V	51:13-14; 51:17- 19	R, FRE 403, C	
51:23–52:18	OB; F; SPEC; L			
53:6–54:8	OB; F; SPEC; L	65:19-20; 65:23- 66:4; 121:22- 122:12	R, FRE 403, FN, AF, S, ID	
57:9–59:5	OB; F; SPEC; L; 403; R	121:22-122:12	R, FRE 403, FN, AF, ID	
59:7–60:6	OB; F; SPEC; L; 403; R	121:22-122:12	R, FRE 403, FN, AF, ID	
60:9–61:4	OB; F; SPEC; L; 403; R	121:22-122:12	R, FRE 403, FN, AF, ID	

Third Party Deposition Designations Yves Konigshofer, Ph.D., SeraCare				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
61:13–63:8	OB; F; SPEC; L; 403; R	121:22-122:12	R, FRE 403, FN, AF, ID	
63:10–20	OB; F; SPEC; L; 403; R	121:22-122:12	R, FRE 403, FN, AF, ID	
63:22–64:23	OB; F; SPEC; L; 403; R	72:12-14; 72:18- 73:7; 73:10-20; 121:22-122:12	R, FRE 403, FN, AF, S, ID	
66:18–67:15	OB; F; SPEC; L; 403; R	121:22-122:12	R, FRE 403, FN, AF, ID	
67:17–19	OB; F; SPEC; L; 403; R	121:22-122:12	R, FRE 403, FN, AF, ID	
67:25–68:2	OB; F; SPEC; L; 403; R	121:22-122:12	R, FRE 403, FN, AF, ID	
68:6–11	OB; F; SPEC; L; 403; R	121:22-122:12	R, FRE 403, FN, AF, ID	
68:22–69:9	OB; F; SPEC; L; 403; R; LC; O	121:22-122:12	R, FRE 403, FN, AF, ID	
69:11–14	OB; F; SPEC; L; 403; R; LC; O	121:22-122:12	R, FRE 403, FN, AF, ID	
69:16–21	OB; F; SPEC; L; 403; R	121:22-122:12	R, FRE 403, FN, AF, ID	
76:11–24	OB; F; SPEC; L; 403; R	121:22-122:12	R, FRE 403, FN, AF, ID	
77:2–20	OB; F; SPEC; L; 403; R	121:22-122:12	R, FRE 403, FN, AF, ID	
77:22–78:7	OB; F; SPEC; L; 403; R; I	78:23-79:2; 121:22-122:12	R, FRE 403, FN, AF, S, ID	
78:9–22	OB; F; SPEC; L; 403; R	78:23-79:2; 83:2- 3; 83:6; 121:22- 122:12	R, FRE 403, FN, AF, S, ID	
79:3–4	OB; F; SPEC; L; 403; R	121:22-122:12	R, FRE 403, FN, AF, ID	
79:11–17	OB; F; SPEC; L; 403; R	121:22-122:12	R, FRE 403, FN, AF, ID	
79:19–24	OB; F; SPEC; L; 403; R	121:22-122:12	R, FRE 403, FN, AF, ID	
80:2–11	OB; F; SPEC; L; 403; R	121:22-122:12	R, FRE 403, FN, AF, ID	

Third Party Deposition Designations Yves Konigshofer, Ph.D., SeraCare				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
80:13–81:5	OB; F; SPEC; L; 403; R	121:22-122:12	R, FRE 403, FN, AF, ID	
83:8–20	OB; F; SPEC; L; 403; R	121:22-122:12	R, FRE 403, FN, AF, ID	
83:22–84:22	OB; F; SPEC; L; 403; R	121:22-122:12	R, FRE 403, FN, AF, ID	
84:24–85:11	OB; F; SPEC; L; 403; R	85:11-86:10; 121:22-122:12	R, FRE 403, FN, AF, S, ID	
87:14–88:12	OB; F; SPEC; L; 403; R; LC; O	121:22-122:12	R, FRE 403, FN, AF, ID	
89:18–90:2	OB; F; SPEC	121:22-122:12	R, FRE 403, FN, AF, ID	
90:20–24		121:22-122:12	R, FRE 403, FN, AF, ID	
91:8–92:20	OB; F; SPEC	121:22-122:12	R, FRE 403, FN, AF, ID	
98:2–99:5	OB; F; SPEC; L; R; 403; LC	99:7-16; 100:23- 25; 101:1-3; 101:10-15; 103:15-16; 103:19-22	R, FRE 403, C, FN, AF, S	
99:17–100:12	OB; F; SPEC; L; R; 403; LC	99:7-16; 100:23- 25; 101:1-3; 101:10-15; 103:15-16; 103:19-22	R, FRE 403, C, FN, AF, S	
100:14–21	OB; F; SPEC; L; R; 403; LC	99:7-16; 100:23- 25; 101:1-3; 101:10-15; 103:15-16; 103:19-22	R, FRE 403, C, FN, AF, S	
101:4–9	OB; F; SPEC; L; R; 403; LC	99:7-16; 100:23- 25; 101:1-3; 101:10-15; 103:15-16; 103:19-22	R, FRE 403, C, FN, AF, S	
101:21–102:25	OB; F; SPEC; L; R; 403; LC	99:7-16; 100:23- 25; 101:1-3; 101:10-15;	R, FRE 403, C, FN, AF, S, ID	

Third Party Deposition Designations Yves Konigshofer, Ph.D., SeraCare				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Natera's Objections to Defendants' Counter-Designation	Ruling
		103:15-16; 103:19-22; 121:22-122:12		
103:2-7	OB; F; SPEC; L; R; 403; LC	99:7-16; 100:23-25; 101:1-3; 101:10-15; 103:15-16; 103:19-22	R, FRE 403, C, FN, AF, S	
105:14-107:2	OB; F; SPEC; V; 403; R; H	107:20-21; 107:24-108:5	AF, FN, R, FRE 403	
108:11-25	OB; F; SPEC; V; LC			
109:3-22	OB; F; SPEC; LC			
113:24-116:11	OB; F; SPEC; L; 403; R; H	47:12-14; 47:16-19; 47:21-24; 48:2-4; 48:6-7; 48:10-13; 48:15-16; 48:19-20; 48:22-49:8; 49:11-12; 65:19-20; 65:23-66:4; 99:7-16; 100:23-25; 101:1-3; 101:10-15; 103:15-16; 103:19-22; 119:11-13; 133:14-21; 133:24-134:5; 134:13-15; 134:18	ID, FN, AF, R, FRE 403, S, MIS	
117:1-119:10	OB; F; SPEC; L; 403; R; H	47:12-14; 47:16-19; 47:21-24; 48:2-4; 48:6-7; 48:10-13; 48:15-16; 48:19-20; 48:22-49:8; 49:11-12; 65:19-	ID, FN, AF, R, FRE 403, S, MIS	

Third Party Deposition Designations Yves Konigshofer, Ph.D., SeraCare				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
		20; 65:23-66:4; 99:7-16; 100:23- 25; 101:1-3; 101:10-15; 103:15-16; 103:19-22; 119:11-13; 133:14-21; 133:24-134:5; 134:13-15; 134:18		
135:7–9	F; SPEC	134:13-15; 134:18	R, FRE 403, MIS, ID	

Third Party Deposition Designations Long Phi Le, M.D.				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
8:8–9:5	R, 403, LW, V			
11:6–10	LW			
25:8–25	R, 403, I, LW, PK, SPEC, V	24:14-15; 24:17- 25:7; 26:1-10	FRE 403, R, MIL	
26:11–14	R, 403, CP, I, LW, V	26:14-27:14	FRE 403, R, FN, V, MIL	
27:18–25	R, 403, I, LW, V	27:15-17; 28:1-6	FRE 403, R, FN, V, S, MIL	
28:7–17	R, 403, F, LW, PK, SPEC, V			
31:24–32:1	R, 403, AA, LW, PK, SPEC, V	31:3-23	FRE 403, R, FN, V, S	
39:1–18	R, 403, LW, V	40:8-42:9	FRE 403, R, FN, V, S	
39:24–40:6	R, 403, F, LW, OB, V	40:8-42:9	FRE 403, R, FN, V, S	
42:10–44:19	R, 403, LW, O, V	40:8-42:9; 45:4- 17	FRE 403, R, FN, V, S, L, O	
45:18–46:5	R, 403, I, LW, V	46:6-47:21	FRE 403, R, FN, V, S, L, O, MIL	
48:14–49:2	R, 403, LW, V			
49:9–51:14	R, 403, CP, LW, SPEC, V			
54:5–19	R, 403, F, I, LW, SPEC, V	54:20-55:2	V, FN, FRE 403, R, OBJ	
55:3–4	R, 403, I, LW, V	55:6-21	V, FN, FRE 403, R	
55:22–56:6	R, 403, LW, V			
56:8–58:8	R, 403, H, LW, PK, SPEC, V			
58:5–60:9	R, 403, F, H, LW, PK, SPEC, V			
60:12–62:21	R, 403, F, LW, OB, PK, SPEC, V	62:22-23; 63:1- 18; 63:25-65:16	FN, S, FRE 403, R, L, O	
65:17–67:15	R, 403, F, LW, PK, SPEC, V			

Third Party Deposition Designations Long Phi Le, M.D.				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
67:19–68:17	R, 403, F, I, LW, PK, SPEC, V	68:17-24	FRE 403, R, S, FN, L, O	
68:25–69:15	R, 403, F, LW, V			
69:18–70:4	R, 403, F, LW, PK, SPEC, V			
71:3–22	R, 403, I, LW, SPEC, V	70:24-71:3	S, FN, L, O, FRE 403, R, OBJ	
72:1–14	R, 403, F, I, LW, PK, SPEC, V	70:24-71:3	S, FN, L, O, FRE 403, R, OBJ	
72:18–73:9	R, 403, LW, SPEC, V			
73:17–22	R, 403, LW, SPEC, V, MIL	73:10-16	S, FRE 403, R, FN	
74:7–75:6	R, 403, LW, PK, SPEC, V			
76:25–78:9	R, 403, LW, SPEC, V	78:10-80:13	S, FRE 403, R, FN, L, O	
80:14–81:25	R, 403, I, LW, MIS, PK, SPEC, V	82:1-18; 83:4-15; 83:18-20	S, FRE 403, R, FN, L, O	
83:21–85:18	R, 403, F, LW, PK, SPEC, V			
86:17–87:3	R, 403, LW, V			
87:4–88:9	R, 403, F, I, LW, PK, SPEC, V	88:13-22	FN, S, FRE 403, R	
88:23–89:19	R, 403, H, I, LW, NR, PK, SPEC, V	87:5-7; 87:9-21; 88:13-22	FN, S, FRE 403, R	
90:22–91:3	R, 403, I, LW, PK, SPEC, V	87:5-7; 87:9-21; 88:13-22; 91:4- 11; 94:8-16	FN, S, FRE 403, R, AF	
91:12–92:15	R, 403, H, I, LW, PK, SPEC, V	87:5-7; 87:9-21; 88:13-22; 91:4-11	FN, S, FRE 403, R	
93:25–94:7	R, 403, I, LW, PK, SPEC, V	87:5-7; 87:9-21; 88:13-22; 94:8-16	FN, S, FRE 403, R	
95:3–5	R, 403, LW, V			
95:17–96:6	R, 403, I, LW, PK, SPEC, V	95:10-13; 96:7-13	FRE 403, R, S, V, FN	

Third Party Deposition Designations Long Phi Le, M.D.				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
96:14-19	R, 403, I, LW, PK, SPEC, V	95:10-13; 96:7- 13; 96:21-25	FRE 403, R, S, V, FN	
98:19-99:21	R, 403, LW, PK, SPEC, V			
104:2-25	R, 403, LW, NR, V			
105:1-107:23	R, 403, H, LW, PK, SPEC, V			
109:8-111:3	R, 403, H, I, LW, O, PK, SPEC, V	111:4-10	V, S, FN, FRE 403, R, OBJ	
111:11-113:10	R, 403, F, H, LW, NR, PK, SPEC, V			
115:23-116:12	R, 403, LW, PK, SPEC, V			
116:19-117:12	R, 403, AA, F, LW, PK, SPEC, V	117:13-17	V, S, FN, FRE 403, R	
117:23-118:25	R, 403, LW, PK, SPEC, V			
119:5-11	R, 403, I, LW, V	119:12-15	FRE 403, R, V, FN	
119:16-18	R, 403, LW, V			
121:4-123:20	R, 403, F, H, LW, MIS, SPEC, V	123:21-124:12	FRE 403, R, V, FN, S	
124:13-125:12	R, 403, LW, PK, SPEC, V	123:21-124:12; 125:13-22	FRE 403, R, V, FN, S	
128:2-129:3	R, 403, I, LW, PK, SPEC, V	126:1-24; 129:4-130:10	FRE 403, R, V, FN, S, MIL, L, O	
131:4-132:2	R, 403, I, LW, O, NR, PK, V	126:1-24; 129:4-130:10; 132:3-21	FRE 403, R, V, FN, S, MIL, L, O	
132:22-24	R, 403, I, LW, V	132:25-133:23	L, O, MIL, S, FN, FRE 403, R, OBJ	
133:23-134:1	R, 403, I, LW, V	132:25-133:23	L, O, MIL, S, FN, FRE 403, R, OBJ	

Third Party Deposition Designations Long Phi Le, M.D.				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
134:5–21	R, 403, I, LW, V	134:22-136:5	L, O, MIL, S, FN, FRE 403, R	
135:3–20	R, 403, LW, V			
136:1–24	R, 403, F, LW, SPEC, V	136:25-137:13	L, O, S, FN, FRE 403, R	
137:14–141:13	R, 403, F, H, LW, SPEC, V			
141:20–143:18	R, 403, F, LW, PK, SPEC, V			
143:22–25	R, 403, LW, PK, SPEC, V			
144:2–8	R, 403, F, LW, PK, SPEC, V			
145:4–147:14	R, 403, F, H, LW, PK, SPEC, V	147:15-148:9	FRE 403, R, L, O, FN, S	
148:10–150:22	R, 403, F, LW, PK, SPEC, V	147:15-148:9	FRE 403, R, L, O, FN, S	
151:23–24	R, 403, LW, SPEC, V			
152:1–10	R, 403, I, LW, PK, SPEC, V	152:12-153:1	FN, S, FRE 403, R	
153:2–155:8	R, 403, H, I, LW, OB, PK, SPEC, V	152:12-153:1	FN, S, FRE 403, R	
155:9–157:1	R, 403, H, LW, PK, SPEC, V			
157:2–159:20	R, 403, F, LW, PK, SPEC, V			
159:25–160:3	R, 403, LW, PK			
161:17–24	R, 403, LC, LW, PK, SPEC, V			
162:2–6	R, 403, I, LC, P LW, K, SPEC, V	162:7-9	FRE 403, R, FN, OBJ	
162:10–164:14	R, 403, H, AA, LW, PK, SPEC, V			

Third Party Deposition Designations Long Phi Le, M.D.				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
164:15–166:22	R, 403, F, H, LC, LW, PK, SPEC, V			
166:24–167:2	R, 403, F, LW, PK, SPEC, V			
167:17–170:6	R, 403, F, H, LW, PK, SPEC, V			
170:8–172:13	R, 403, F, H, I, LC, LW, PK, SPEC, V	170:7	FRE 403, R, S, FN, OBJ	
172:20–21	R, 403, F, LW, PK, SPEC, V			
172:24–25	R, 403, LW, PK			
173:2–175:20	R, 403, F, H, I, LC, LW, PK, SPEC, V	175:21-24	FRE 403, R, S, FN, V	
175:25–180:1	R, 403, F, LC, LW, PK, SPEC, V			
180:5–12	R, 403, LW, PK, SPEC, V			
180:14–185:8	R, 403, AA, F, H, I, LW, PK, SPEC, V	185:9-23	S, FN, V, AF, FRE 403, R	
185:24–188:1	R, 403, H, I, LW, PK, V	188:2-3	FRE 403, R, S, OBJ	
188:2–189:8	R, 403, IH, LW, PK, SPEC, V			
189:11	LW			
189:14–190:13	R, 403, F, LW, PK, SPEC, V			
190:15–17	R, 403, LW, V			
190:19–192:10	R, 403, ARG, F, LW, PK, SPEC, V			
192:11–194:25	R, 403, MIS, LW, PK, SPEC, V			

Third Party Deposition Designations Long Phi Le, M.D.				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
196:5–16	R, 403, F, LW, PK, V			
197:2–9	R, 403, LW, V			
197:18–198:24	R, 403, LW, PK, SPEC, V			
199:9–17	R, 403, LW, SPEC, V			

Rule 30(b)(1) Deposition Designations Jason Myers				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
11:17–19				
24:22–25:25	403; R; V			
39:15–40:9	403; R; V			
43:6–16	403; R; V			
50:1–25	OB; SPEC; 403; R; V	49:18-25	R, FRE 403, FN, ID, S	
53:4–54:1	403; R; V	54:2-4	R, FRE 403, ID	
76:14–77:15	403; R; V	54:2-4	R, FRE 403, ID	
78:10–18	403; R; V			
78:21–79:17	403; R; V			
88:17–89:12	403; R; V; I	89:13-90:18; 90:20-22	R, FRE 403, C, S	
93:11–94:5	403; R; V; CP; OB; MIS	94:6-10; 94:12- 13; 94:16-95:10; 97:6-98:9	R, FRE 403, C, S	
98:10–100:17	403; R; V	97:6-98:9; 101:10-18; 101:22-25	R, FRE 403, ID, S	
102:15–104:13	403; R; V	101:10-18; 101:22-25	R, FRE 403, ID, S	
105:19–106:11	403; R; V; I	106:12-107:8	R, FRE 403, ID	
114:3–115:11	403; R; V; I	115:12-116:1	R, FRE 403, ID, S	
128:20–129:14	403; R; V; I	127:3-8; 127:11- 128:10; 129:15- 18	R, FRE 403, C, S	
133:16–135:18	403; R; V; I	135:19-136:3	R, FRE 403, C, S	
145:18–20	403; R; V; I	145:25-146:3	R, FRE 403, C, S	
157:10–23	403; R; V	157:24-158:1	R, FRE 403, C, S	
158:2–159:12	403; R; V			
161:4–22	403; R; V			
163:8–164:1	403; R; V			
165:9–10				
165:23–166:5	403; R; V			
166:15–18	403; R; V			
166:19–170:14	403; R; V			
170:22–171:20	403; R; V			
172:10–173:4	403; R; V			

Rule 30(b)(1) Deposition Designations Jason Myers				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
173:20–174:7	403; R; V			
178:1–25	403; R; V; OB			
180:5–15	403; R; V; I	180:16-21	R, FRE 403, C	
181:14–182:7	403; R; V			
197:1–13	403; R; V			
200:20–204:1	403; R; V; IH; O			
204:12–205:6	403; R; V			
209:2–7	403; R; V			
209:14–24	403; R; V; I	211:6-12; 211:19- 212:2	R, FRE 403, C	
209:25–210:21	403; R; V; I	211:6-12; 211:19- 212:2	R, FRE 403, C	
211:13–18	403; R; V; I	211:6-12; 211:19- 212:2	R, FRE 403, C	
212:24–213:5	403; R; V; I	211:6-12; 211:19- 212:2	R, FRE 403, C	
231:8–16	403; R; V; I	231:17-22	R, FRE 403, C	
232:18–19				
232:22–233:12	403; R; V			
233:20–234:24	403; R; V			
235:7–8				
235:13–15				
235:21–236:7	403; R; V			
236:8–19	403; R; V			
237:5–19	403; R; V			
238:2–240:3	403; R; V			
240:24–241:13	403; R; V; OB			
243:21–244:2	403; R; V			

Rule 30(b)(6) Deposition Designations Joshua Stahl September 3, 2021				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
9:9–24	LW			
12:13–13:3	LW			
14:6–15:11	LW, OB, R, 403, V			
15:24–17:14	LW, R, 403, V, O			
23:15–24:7	LW, R, 403, V, O, I	24:8-10; 24:12-14	FN, FRE 403, R	
30:3–14	LW, OB, R, 403, V, O, SPEC, PK, I	29:7-30:2	FRE 403, R, L, O, S	
43:10–44:25	LW, OB, R, 403, V, SPEC, PK, O, I	45:4-11	ID, FN, S, FRE 403, R	
46:15–47:22	LW, OB, R, 403, V			
50:10–24	LW, OB, R, 403, V, I	50:25-51:1	FN, S, FRE 403, R	
53:19–20	LW, R, 403, V, O, SPEC, PK, H, LC	53:1; 53:4-17	SC, AF, FRE 403, R	
54:10–19	LW, R, 403, V, O, SPEC, PK, H, LC, I	53:22-54:9	SC, AF, FRE 403, R	
54:21–24	LW, R, 403, V, I	55:2-10	FN, V, FRE 403, R	
58:20–61:25	LW, OB, R, 403, V, SPEC, PK, H			
60:17–63:11	LW, OB, R, 403, V, SPEC, PK, H			
63:13–66:7	LW, OB, R, 403, V, SPEC, PK			
68:12–69:19	LW, OB, R, 403, V, SPEC, PK			
70:12–71:19	LW, R, 403, V			
72:1–18	LW, R, 403, V			
73:21–74:11	OB			

Rule 30(b)(6) Deposition Designations Joshua Stahl September 3, 2021				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
79:18–80:4	LW, OB, R, 403, V, PK, SPEC, O			
82:2–84:2	LW, OB, R, 403, V, PK, SPEC, BTS, O, I	84:4-5; 84:8-23	FRE 403, R	
88:14–22	LW, OB, R, 403, V	88:24-25; 89:2-12	FRE 403, R	
118:17	LW, I			
134:15–136:21	LW, OB, R, 403, V, SPEC, F, BTS			
143:19–144:16	LW, OB, R, 403, V, SPEC, BTS	143:11-12; 143:14-17	FRE 403, R, FN, S	
144:18–146:6	LW, R, 403, V, SPEC, BTS			
146:7–149:15	LW, R, 403, V, SPEC, BTS, LC, O			
148:3–150:5	LW, OB, R, 403, V, SPEC, BTS, LC, O			
149:17–150:5	LW, OB, R, 403, V, BTS			
150:14–151:8	LW, OB, R, 403, V, SPEC, BTS			
150:22–151:8	LW, OB, R, 403, V, SPEC, PK			
151:9–153:17	LW, OB, R, 403, V, SPEC, PK, H			
155:24–157:3	LW, R, 403, V, SPEC, PK, H			
157:4–21	LW, R, 403, V, SPEC, PK, BTS			
164:13–165:10	LW, R, 403, V, H, I	165:11-25	FRE 403, R, FN, S	
166:14–24	LW			

Rule 30(b)(6) Deposition Designations Joshua Stahl September 3, 2021				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
181:24–182:2	LW, R, 403, V, F			
185:25–186:16	LW, R, 403, V, BTS, LC, O			
186:17–25	LW, OB, R, 403, V, BTS, LC, O, I	187:1-4	FRE 403, R, FN, S	
194:19–195:21	LW, R, 403, V, F, BTS	195:22-24; 196:3- 6; 196:9-12	S, AF, OBJ, FRE 403, R	
204:20–205:18	LW, R, 403, V			
205:19–207:23	LW, OB, R, 403, V, SPEC, BTS, O	208:7-14	FN, S, FRE 403, R, MIL	
261:14–23	LW, R, 403, V, I, BTS	261:6-8	FN, S, FRE 403, R	
263:6–23	LW, OB, R, 403, V, SPEC, BTS			
275:19–276:4	LW, R, 403, V			
286:25–288:10	LW, OB, R, 403, V, IH, SPEC, BTS			
289:1–290:18	LW, OB, R, 403, V, SPEC, BTS, O			
298:17–300:13	LW, OB, R, 403, V, BTS, SPEC, PK, O			

Rule 30(b)(6) Deposition Designations Joshua Stahl November 22, 2021				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
5:18-23	LW, MIL			
5:18-7:24	LW, MIL			
6:23-7:24	LW, MIL			
8:10-14	LW, R, 403, V, I; NARR, MIL	7:25-8:9; 9:2-6; 9:9-15	FRE 403, R, MIL, S, AF	
9:16-11:1	LW, OB, R, 403, V, LC, PK, SPEC, I, MIL			
11:25-12:25	LW, R, 403, V, LC, SPEC, I, MIL	13:1-6; 13:8-11	FRE 403, R, MIL, S, AF, L	
13:13-20	LW, OB, R, 403, V, MIL			
13:21-14:19	LW, R, 403, V, LC, SPEC, MIL			
17:4-17	LW, R, 403, V, LC, SPEC, MIL			
19:20-20:3	LW, OB, R, 403, V, LC, SPEC, MIL			
20:5-19	LW, OB, R, 403, V, LC, SPEC, MIL			

Rule 30(b)(6) Deposition Designations Jill Stefanelli				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Natera's Objections to Defendants' Counter-Designation	Ruling
9:13–15	OB			
21:6–14	BTS			
25:5–19	OB; BTS; 403; I	24:23-25; 25:4		
27:11–18	403; R			
28:17–29:18	I; V; SPEC; 403; R; BTS	28:1-16	R, FRE 403, C	
30:24–31:16	OB; BTS; V; 403; R			
39:10–16	OB; MIS; 403; R; BTS;	39:1-9	R, FRE 403, C	
39:17–40:3	BTS; 403; R			
40:5–41:14	BTS; 403; R			
57:7–21	BTS; 403; R			
59:7–61:5	OB; BTS; 403; R			
70:21–71:18	BTS; 403; R; NARR; SPEC; F			
100:11–101:17	BTS; 403; R	99:15-100:10; 101:18-102:6	R, FRE 403, C, ID	
107:23–108:10	BTS; 403; R			
109:4–8	BTS; 403; R			
109:11–23	BTS; 403; R	111:8-20; 112:7-12; 114:21-23; 114:25-116:9; 117:2-12; 135:23-136:13; 138:16-20; 138:22-139:3; 139:12-14; 139:18-140:14	R, FRE 403, C, FN, ID	
109:24–111:7	BTS; 403; R	111:8-20; 112:7-12; 114:21-23; 114:25-116:9; 117:2-12; 135:23-136:13; 138:16-20; 138:22-139:3; 139:12-14; 139:18-140:14	R, FRE 403, C, FN, ID	
112:13–114:19	OB; BTS; 403; R	111:8-20; 112:7-12; 114:21-23;	R, FRE 403, C, FN, ID	

Rule 30(b)(6) Deposition Designations Jill Stefanelli				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
		114:25-116:9; 135:23-136:13; 138:16-20; 138:22-139:3; 139:12-14; 139:18-140:14		
120:19–23	BTS; 403; R			
121:23–123:7	BTS; 403; R			
126:13–129:1	BTS; 403; R			
129:9–130:14	BTS; 403; R			
131:24–133:3	BTS; 403; R; SPEC			
133:19–23	BTS; 403; R SPEC	133:10-18	R, FRE 403, C	
134:17–135:7	BTS; 403; R SPEC			
135:8–16	BTS; 403; R			
143:7–15	BTS; 403; R			
145:7–147:6	OB; BTS; 403; R			
149:2–152:24	OB; BTS; 403; R; V; SPEC; F			
153:2–155:1	BTS; 403; R			
157:21–158:20	BTS; 403; R			
159:5–160:10	I; BTS; 403; R	160:11-161:19	R, FRE 403, C	
161:20–162:17	BTS; 403; R	160:11-161:19	R, FRE 403, C	
170:1–171:3	BTS; 403; R			
177:9–178:19	BTS; 403; R; SPEC			
179:9–14	BTS; 403; R			
183:19–24	BTS; 403; R; SPEC			
184:20–185:16	BTS; 403; R			
201:2–202:13	BTS; 403; R	213:19-21; 213:23-214:12; 214:14-19	R, FRE 403, C, ID	
202:16–23	BTS; 403; R	213:19-21; 213:23-214:12; 214:14-19	R, FRE 403, C, ID	

Rule 30(b)(6) Deposition Designations Jill Stefanelli				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
203:11–23	BTS; 403; R	213:19-21; 213:23-214:12; 214:14-19	R, FRE 403, C, ID	
204:5–205:4	BTS; 403; R	213:19-21; 213:23-214:12; 214:14-19	R, FRE 403, C, ID	
207:7–208:10	BTS; 403; R; I	208:11-209:1; 213:19-21; 213:23-214:12; 214:14-19	R, FRE 403, C, ID	
209:21–210:4	BTS; 403; R	213:19-21; 213:23-214:12; 214:14-19	R, FRE 403, C, ID	
213:10–18	BTS; 403; R	213:19-21; 213:23-214:12; 214:14-19	R, FRE 403, C, ID	
214:21–24	BTS; 403; R; I	213:19-21; 213:23-214:12; 214:14-19; 214:25-215:6	R, FRE 403, C, ID	
215:11–217:12	OB; BTS; 403; R; H; SPEC; V			
221:13–18	BTS; 403; R	221:2-12	R, FRE 403, C	
230:9–17	BTS; 403; R; I; V	230:2-8; 230:18- 231:14	R, FRE 403, C	
231:15–233:7	BTS; 403; R; I	233:8-17	R, FRE 403	
241:8–15	BTS; 403; R			
248:23–249:15	BTS; 403; R			
250:5–252:9	BTS; 403; R; V			
260:9–16	BTS; 403; R; I; V; F			
260:17–263:1	OB; BTS; 403; R; I; V; F; SPEC			
263:11–264:14	BTS; 403; R			
264:15–265:16	BTS; 403; R			

Rule 30(b)(1) Deposition Designations Holly Tillson				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
12:12-14				
15:9-19				
16:3-17:7				
18:4-9	R, 403, V			
18:15-19	R, 403, V			
19:1-2	R, 403, V			
19:4-20:16	R, 403, V			
20:19-23:2	R, 403, V, OB, PK, SPEC, H	32:13-33:6	R, FRE 403, FN	
23:15-21	R, 403, V			
24:24-25:12				
26:15-16				
26:24-27:8	R, 403, V	17:19-21	ID, FN, R, FRE 403	
27:22-28:8		28:9-12	C, R, FRE 403	
28:13-30:4				
30:14-31:6	R, 403			
31:11-32:8	R, 403			
33:7-34:10	R, 403	34:11-35:19	R, FRE 403, C	
35:24-38:7	R, 403, V, OB, LC, SPEC, H			
38:9-40:4				
40:6				
40:8-19	R, 403			
40:20-24		40:25-41:24	R, FRE 403, C	
41:25-44:11	R, 403, V, O, SPEC, OB, LC	44:24-45:5; 45:19-24; 46:1-4	R, FRE 403, FN, AF, S, ID	
47:16-48:11	R, 403, LC			
48:22-49:3		49:7-9; 50:17-24	R, FRE 403, C	
51:17-52:16	R, 403, V, O, SPEC, LC, F	52:17-20	R, FRE 403	
52:21-54:13	R, 403, V, O, SPEC, LC, F, OB	54:14-16; 54:18; 54:20-25; 55:1- 22; 56:1-4; 57:9- 12; 57:14-16	ID, FN, R, FRE 403	
57:23-59:21	R, 403	59:22-60:19	R, FRE 403, C	
61:6-62:14				

Rule 30(b)(1) Deposition Designations Holly Tillson				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
62:23–64:6	R, 403, OB, LC, SPEC	64:7-11	R, FRE 403, C	
64:23–65:2				
66:4–23	R, 403, V, SPEC, OB			
67:14–70:8	R, 403, V, SPEC, OB, F	70:9-11	R, FRE 403, C	
70:12–71:18	R, 403, V, O, SPEC, PK, H, OB			
72:4–14		72:15-23	R, FRE 403, C	
72:24–73:5	R, 403, SPEC	73:6-17	R, FRE 403, C, S	
73:18–25				
76:17–77:2		77:14-78:14; 80:25-81:2; 81:6- 13	R, FRE 403, C, FN, ID	
81:14–19		77:14-78:14; 80:25-81:2; 81:6- 13	R, FRE 403, C, FN, ID	
82:4–83:15	R, 403, V, SPEC, O	83:16-24	R, FRE 403, C, FN, S	
84:8–23	R, 403, V, SPEC, OB			
85:10–86:5	R, 403, SPEC, OB	86:9-14	R, FRE 403	
86:24–88:7				
88:16–89:3				
89:17–90:24		91:22-92:16; 92:17-22; 92:25- 93:3; 93:6-13	ID, FN, R, FRE 403	
93:14–22		92:17-22; 92:25- 93:3; 93:6-13; 93:23-94:1	ID, FN, R, FRE 403	
94:9–15				
95:1–19				
96:19–97:5	SPEC			
99:3–9	R, 403, SPEC, V	99:14-19	R, FRE 403	
102:7–103:24	R, 403			
104:2–24	R, 403	105:7-106:3, 108:9-19; 109:5-	FN, R, FRE 403	

Rule 30(b)(1) Deposition Designations Holly Tillson				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
		20; 110:2-4; 110:20-23; 111:5- 7; 112:9-11		
106:4–15	R, 403, SPEC	106:21-107:2	R, FRE 403, C, ID	
107:3–19				
107:25–108:8				
108:20–109:4				
111:16–112:8				
112:14–20				

Rule 30(b)(6) Deposition Designations Ryan Walters				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
9:20–10:1				
12:9–13:4				
17:23–18:3	R, 403, V,	18:4-18	FRE 403, R, FN, S	
22:2–14	R, 403, V, SPEC	22:15-16; 22:18- 23:4	FRE 403, R, FN, MIL, L, O	
27:18–28:20	R, 403, V	27:6-17	FRE 403, R, FN, MIL, L, O	
29:2–30:7	R, 403, V, SPEC, PK			
34:3–13	R, 403, V, O	32:14; 32:20-34:2	S, FN, FRE 403, R	
35:3–6				
37:6–8	R, 403, V, ARG	35:10-37:1	ID, FN, S, FRE 403, R	
37:11–21	R, 403, V			
38:11–39:18	R, 403, V, SPEC, PK, I	39:19-20; 39:23- 40:2	FRE 403, R, S	
39:21–22	R, 403, V, OB	39:23-40:2	FRE 403, R, S	
40:16–41:14	R, 403, V			
41:20–24	R, 403, V			
42:1–25	R, 403, V			
43:5–10				
44:24–45:3				
45:7				
45:9–11	R, 403, V, I	45:12-18	FRE 403, R	
45:19–46:1	R, 403, V	46:2-21	S, FRE 403, R	
46:22–47:20	R, 403, V			
48:10–21	R, 403, V, SPEC, F, I	48:1-9	FN, S, C, FRE 403, R	
49:2–6	R, 403, V, SPEC, PK,	48:23-1	FN, S, FRE 403, R	
49:8–10	R, 403, V, SPEC, PK			
49:22–24	R, 403, V, SPEC PK, I	49:13-21	FN, S, FRE 403, R	
50:1–12	R, 403, V, SPEC, PK, I	50:13-19; 50:22- 25	S, FN, FRE 403, R	

Rule 30(b)(6) Deposition Designations Ryan Walters				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
51:8–52:20	R, 403, V, SPEC, F, OB	52:21-53:12	S, FN, FRE 403, R	
53:13–14	R, 403, V, SPEC, PK			
53:16–18	R, 403, V, SPEC, PK			
53:20–54:4	R, 403, V, SPEC, PK	54:21-24	FRE 403, R, FN, S	
54:14–20	R, 403, V, SPEC, PK			
54:25–55:2	R, 403, V, SPEC, PK	55:3-7	FRE 403, R, FN, S	
58:3–23	R, 403, V, SPEC, PK, O	57:12-58:2; 58:24-25; 59:2-3; 59:5-24	O, FRE 403, R, FN, S	
62:6–20	R, 403, V, SPEC, PK, O, I	62:21-63:1	FRE 403, R, MIL, L, O	
64:4–16	R, 403, V, SPEC, PK, O			
64:18–66:3	R, 403, V, SPEC, PK, O			
66:17-20	R, 403, V, SPEC, PK, O			
66:24–68:1	R, 403, V, SPEC, PK, O, I	66:4-16; 66:21- 23; 68:2-9	FRE 403, R, L, O, S	
69:21–70:16	R, 403, V, SPEC, PK, O	68:19-20; 69:13- 19	FRE 403, R, FN, S	
70:20–71:12	R, 403, V, SPEC, PK, O			
71:22–72:19	R, 403, V, SPEC, PK, O, I	72:20-73:24	FRE 403, R, AF, S, FN	
73:25–74:11	R, 403, V, SPEC, PK, O, H	72:20-73:24; 74:12-14	FRE 403, R, AF, S, FN, OBJ	
74:15–16	R, 403, V, SPEC, PK, O, H			
75:6–10	R, 403, V, SPEC, PK, O, H	75:16-76:7; 76:19-20; 76:23- 77:4; 77:7-10	FRE 403, R, L, O, S	

Rule 30(b)(6) Deposition Designations Ryan Walters				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
77:20–24	R, 403, V, SPEC, PK, O, H	75:16-76:7; 76:19-20; 76:23- 77:4; 77:7-10	FRE 403, R, L, O, S	
80:21–82:8	R, 403, V, SPEC, PK, O, H	82:9-20	AF, FRE 403, R, S, FN	
82:21–84:14	R, 403, V, SPEC, PK, O, H			
85:6–86:22	R, 403, V, SPEC, PK, O, H, I	84:15-85:5	AF, FRE 403, R, S, FN	
88:6–11				
88:18–89:6	R, 403, V, SPEC, PK, O, H, I	89:7-19	FN, AF, S, ID, FRE 403, R	
89:21–23	R, 403, V, SPEC, PK, O, H			
94:24–95:3				
95:7–19	R, 403, V, SPEC, PK, O, H, I	95:20-96:13	FN, AF, S, ID, FRE 403, R	
97:11–15	R, 403, V, SPEC, PK			
99:17–25	R, 403, V, SPEC, PK, O			
100:3–22	R, 403, V, SPEC, PK, O, H, I	100:22-101:4	FRE 403, R, FN, AF, S	
105:10–14				
105:20–106:16	R, 403, V			
106:20–107:4	R, 403, V, SPEC, PK, O, H, I	106:17-19; 115:20-116:24	O, FN, S, FRE 403, R, AF	
107:17–111:6	R, 403, V, SPEC, PK, O, H	111:7-10; 111:13- 20; 115:20- 116:24	FN, S, AF, FRE 403, R	
112:1–7	R, 403, V, SPEC, PK, O, H, I	112:7-11; 115:20- 116:24	FN, S, AF, FRE 403, R	
112:12–15	R, 403, V, SPEC, PK, O, H	112:16-22; 115:20-116:24	FN, S, AF, FRE 403, R	
112:24–113:11	R, 403, V, SPEC, PK, O, H, I	113:12-114:13; 115:20-116:24	FN, S, AF, FRE 403, R	
114:14–23	R, 403, V			
127:3–12	R, 403, V			

Rule 30(b)(6) Deposition Designations Ryan Walters				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
127:14–16	R, 403, V	127:25-128:12	FN, S, FRE 403, R	
129:10–12	R, 403, V			
129:14–17	R, 403, V			
129:19–130:5	R, 403, V, O			
130:13–131:2	R, 403, V			
131:12–132:21	R, 403, V, H, O, OB, MIS			
135:17–136:7	R, 403, V, SPEC, PK, O, H			
136:14–138:9	R, 403, V, SPEC, PK, O, H			
140:1–6				
140:13–25	R, 403, V, SPEC, PK, H			
142:17–21	R, 403, V	142:3-16; 142:22- 143:7	FRE 403, R, FN, S, AF	
145:8–12	R, 403, V			
145:18–146:3	R, 403, V	146:4-147:1; 147:19-24	FRE 403, R, FN, S, AF	
147:25–148:13	R, 403, V	146:4-147:1; 147:19-24	FRE 403, R, FN, S, AF	
148:19–149:2	R, 403, V, I	149:3-6; 149:12- 18; 149:20-24; 150:19-20; 150:23-151:1	ID, FN, FRE 403, R, AF, S	
149:7–11	R, 403, V			
152:11–24	R, 403, V, PK, SPEC			
153:1–7	R, 403, V, PK, SPEC			
153:12–155:15	R, 403, V, PK, SPEC			
156:4–13	R, 403, V, PK, SPEC			
156:21–158:17	R, 403, V, PK, SPEC, I	158:18-24	ID, FRE 403, R, FN, AF, S	
158:25–159:13	R, 403, V, PK, SPEC			

Rule 30(b)(6) Deposition Designations Ryan Walters				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
159:16–25	R, 403, V, PK, SPEC, H			
160:4–6	R, 403, V, PK, SPEC			
160:13–16	R, 403, V, PK, SPEC, I	160:7-12; 160:17- 19	ID, FRE 403, R, FN, AF, S	
160:20–161:17	R, 403, V, PK, SPEC			
162:7–163:22	R, 403, V, PK, SPEC			
163:25–164:9	R, 403, V, PK, SPEC			
164:11	R, 403, V, PK, SPEC			
164:17–18	R, 403, V, PK, SPEC	164:19-165:6	ID, FRE 403, R, FN, AF, S	
165:7–12				
165:15–21	R, 403, SPEC, I	165:21-166:18	ID, FRE 403, R, FN, AF, S	
167:19–168:6	R, 403, SPEC, H, O			
168:24–25	R, 403, V, PK, SPEC, H			
169:4–20	R, 403, V, PK, SPEC, H			
170:6–8				
170:17–171:21	R, 403, V, PK, SPEC, H, O			
174:23–175:7	R, 403, V			
175:11–176:12	R, 403, V, PK, SPEC, H			
176:24–177:6	R, 403, V, H	177:7-15	AF, S, FN, FRE 403, R	
177:16–20				
177:24–178:15	R, 403, V, H, PK, SPEC, I	177:23		
179:24–180:25	R, 403, V, H	182:16-21	FRE 403, R, FN, S, AF	
183:11–15				

Rule 30(b)(6) Deposition Designations Ryan Walters				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
183:18–187:5	R, 403, V, H, PK, SPEC, O, OB, I	187:6-11	FRE 403, R, FN, AF, S	
189:3–20	R, 403, V, PK, SPEC, H			
191:10–192:9	R, 403, V, PK, SPEC, H			
192:23–25				
193:10–12	I	193:13-24	FRE 403, R, FN, AF, S	
193:25–194:20	R, 403, V, H			
194:22–195:1				
195:4–10	R, 403, V			
198:2–199:8	R, 403, V, PK, SPEC, H, O			
202:10–23	R, 403, V, PK, SPEC, H	201:10-21	FRE 403, R, FN, AF, S	
204:15–205:3	R, 403, V, PK, SPEC, H			
205:6–9	R, 403, V, PK, SPEC, H			
205:21–206:3	R, 403, V, PK, SPEC, H			
206:6–12	R, 403, V, PK, SPEC, H			
213:20–214:6	R, 403, V, PK, SPEC, H			

Rule 30(b)(1) Deposition Designations Mariah White				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
6:17–23				
7:5–9				
9:8–11				
9:16–10:10				
13:10–22				
13:23–14:2				
14:10–15:3	OB; BTS; R			
16:15–25	OB; BTS; R; 403; V			
17:8–21	OB; BTS; R; 403; V			
18:5–21:13	OB; BTS; R; 403; V; NARR; MIS; LC	17:24-25; 18:3	R, FRE 403, C	
22:22–25	OB; I; V; BTS	23:1; 23:3-4; 23:6; 23:8-9; 23:11	R, FRE 403, C	
23:13–24:2	OB; BTS; R;	23:3-4; 23:6; 23:8-9; 23:11	R, FRE 403, C	
24:13–25:10	OB; BTS; R;	23:3-4; 23:6; 23:8-9; 23:11	R, FRE 403, C	
27:17–28:10		28:20-22; 28:25; 29:5-7	R, FRE 403, C	
29:10–30:20	OB; BTS; SPEC; R			
32:7–22	OB; F; R			
33:19–34:17	OB; R; ARG			
35:2–14		36:3-5; 36:8-10	R, FRE 403, C	
36:12–37:4	OB	36:3-5; 36:8-10; 37:5-6; 37:8	R, FRE 403, C	
37:10–38:24	OB; BTS; R; SPEC	38:25-39:5; 39:8; 39:10-14	R, FRE 403, C	
40:3–24	OB; BTS; R;	38:25-39:5; 39:8; 39:10-14	R, FRE 403, C	
41:2–3	OB			
41:12–42:19	OB; BTS; R; SPEC			

Rule 30(b)(1) Deposition Designations Mariah White				
Witness Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Natera's Objections to Defendants' Counter- Designation	Ruling
44:2-23	OB; BTS; R; SPEC			

EXHIBIT 9

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

NATERA, INC.,

Plaintiff / Counter Defendant,

V.

ARCHERDX, INC., ARCHERDX, LLC and
INVITAE CORP.,

Defendants / Counter Claimants.

C.A. No. 20-125 (GBW)
CONSOLIDATED

JURY TRIAL DEMANDED

EXHIBIT 9

DEFENDANTS' DEPOSITION DESIGNATIONS

Pursuant to D. Del. LR 16.3, Defendants ArcherDX, Inc., ArcherDX, LLC and Invitae Corporation (collectively, "Defendants") hereby submit its list of deposition designations that it may offer at trial.

Defendants make these disclosures without prejudice to amending or supplementing the disclosures in the future if necessary, including but not limited to further reducing the designations set forth below. Defendants reserve the right to use any deposition testimony, whether designated or not, for purposes of cross-examination, impeachment, and/or rebuttal. Defendants reserve the right to designate additional deposition testimony or call any witness for live testimony in response to any of Plaintiff Natera Inc.'s ("Natera") deposition designations or for any other reason. Defendants' designations include all exhibits that are referenced in the specified pages and lines, whether or not such exhibits are separately identified. Defendants reserve the right to use any deposition testimony designated by Natera. Inclusion on this list is neither an admission nor a representation as to the admissibility of or relevance to any issue of any deposition designation. By designating deposition testimony, Defendants are neither representing nor admitting that Defendants have the burden of proof on any topic.

Defendants generally object to any deposition testimony counter-designated by Natera that is the subject of the parties' stipulations, agreed motions in limine (if any), Defendants' motions in limine, motions to exclude certain evidence, Daubert motions and challenges to experts, and any dispositive motions. Defendants reserve the right to make additional objections leading up to and at trial.

Defendants reserve the right to assert any one, part, or all of their designations, including any forthcoming counter-designations. Defendants reserve the right to play any portions of

Natera's deposition designations (including counter-designations) for completeness to the extent that Natera attempts to drop any portions of their designations prior to or at trial.

Defendants reserve the right to add to, remove from, and/or supplement these lists of objections to Natera's counter-designations.

Regarding Defendants' objections to Natera's counter-designations, Defendants reserve the right to assert any one, part, or all of its objections. Defendants also reserve the right to assert additional objections or counter-counter designations. Defendants also reserve the right to assert its original affirmative designation as a counter-counter designation to any counter-designation listed by Natera.

Defendants' Objection Key

AA	Asked and answered; Fed. R. Evid. 611(a).
ARG	Argumentative, or attorney argument; Fed. R. Evid. 611(a).
BTS	Beyond the scope of examination or of 30(b)(6) topic; Fed R. Evid. 611, Fed. R. Civ. P. 30(b)(6).
BSD	Counter-Designation Beyond the Scope of the Designation(s)
CP	Compound question.
F	No foundation or assumes facts not in evidence; Fed. R. Evid. 602, 703, 901.
FOW	An objection to form is waived if it was not timely made during the deposition, Fed. R. Civ. P. 32(d)(3)(B).
H	Hearsay if offered for the truth of the matter asserted; Fed. R. Evid. 801, 803, 805.
I	Incomplete designation; Fed. R. Evid. 106, 403.
IH	Incomplete Hypothetical.
L	Leading; Fed. R. Evid. 611(c).
LC	Calls for Legal Conclusion; Fed. R. Evid. 701.
LW	Witness will be testifying live at trial.
MIS	Mischaracterization of testimony or evidence.
NARR	Narrative.
NR	Not responsive; Fed. R. Evid. 611(a).
O	Unqualified Opinion; Fed. R. Evid. 701, 702.
OB	Attorney Objection improperly designated/Improper designation.
P	Privileged; Fed. R. Evid. 501, Fed. R. Civ. P. 26(b)(3),(4)
PK	Lack of personal knowledge; Fed. R. Evid. 602
R	Not relevant; Fed. R. Evid. 401, 402.
SPEC	Calls for Speculation; Fed. R. Evid. 602, 701, 702.
403/CU	Unfairly prejudicial; cumulative, waste of time, Fed. R. Evid. 403.
V	Vague or ambiguous; Fed. R. Evid. 611(a)
O	Calls for improper expert opinion from lay witness; FRE 701-702; FRCP 26(a)(2)

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Babiarz, Joshua			
Date of Deposition: 2021-09-03			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
6:9-12	PRIVACY		
7:13-15	R, FRE 403		FOW
8:11-9:7	R, FRE 403, AF, FN, MIL		FOW
10:18-22	FRE 403, V, S, FN, R, MIL	10:23-25; 11:3-12; 11:15-17	FOW, R, 403, V, SPEC
20:3-17	FRE 403, V, S, FN, R, MIL, L, O	14:18-25; 18:16-19:17; 60:2-25	FOW, R, 403, V, OB, BSD
20:20-21:1	R, FRE 403, AF, FN, MIL, L, O		FOW
21:20-22	R, FRE 403, AF, FN, MIL, L, O	22:15-23:2	R, 403, BSD
21:25-22:1	R, FRE 403, AF, FN, MIL, L, O	22:15-23:2	R, 403, BSD
28:16-17	FRE 403, L, O, S, ARG, R, AF, FN, MIL	22:15-23:2	R, 403, BSD
28:20-21	FRE 403, L, O, S, ARG, R, AF, FN, MIL	22:15-23:2	R, 403, BSD
28:23-29:1	FRE 403, L, O, S, ARG, R, AF, FN, MIL, PRIV		
29:6-7	FRE 403, L, O, S, ARG, R, AF, FN, MIL, PRIV		
29:10-15	FRE 403, L, O, S, ARG, R, AF, FN, MIL		FOW
32:5	FRE 403, L, O, S, R, AF, FN, MIL		FOW
32:7-12	FRE 403, L, O, S, R, AF, FN, MIL		
32:24	FRE 403, L, O, S, R, AF, FN, MIL		
33:2-3	FRE 403, L, O, S, R, AF, FN, MIL		
36:19-21	FRE 403, L, O, S, R, AF, FN, MIL		FOW
38:8-9	FRE 403, L, O, S, R, AF, FN, MIL, ARG	38:18-39:1	R, 403
38:12-13	FRE 403, L, O, S, R, AF, FN, MIL, ARG	38:18-39:1	R, 403

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Babiarz, Joshua			
Date of Deposition: 2021-09-03			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
39:24-40:2	FRE 403, L, O, S, R, AF, FN, MIL, ARG		
40:5-7	FRE 403, L, O, S, R, AF, FN, MIL, ARG		
40:9-20	FRE 403, L, O, S, R, AF, FN, MIL, ARG		FOW
40:23-24	FRE 403, L, O, S, R, AF, FN, MIL, ARG		
42:4-5	FRE 403, L, O, S, R, AF, FN, MIL		FOW
42:7-10	FRE 403, L, O, S, R, AF, FN, MIL		FOW
44:20-45:8	FRE 403, L, O, S, R, AF, FN, MIL		FOW
48:9-10	FRE 403, L, O, S, R, AF, FN, MIL		
48:13-21	FRE 403, L, O, S, R, AF, FN, MIL		FOW
48:23	FRE 403, L, O, S, R, AF, FN, MIL		
48:25-49:10	FRE 403, L, O, S, R, AF, FN, MIL, PRIV	45:13-16	R, 403, BSD
54:6-13	R, FRE 403, MIL, ID	54:14-20	FOW, R, 403, PK, OB
61:14-22	V, R, MIL		FOW
68:22	FRE 403, L, O, R, AF, FN, MIL		FOW
68:24-69:3	FRE 403, L, O, R, AF, FN, MIL	76:5-14	FOW, R, 403, V, BSD
69:21-70:7	FRE 403, L, O, R, AF, FN, MIL, S	76:5-14	FOW, R, 403, V, BSD

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Banjevic, Milena			
Date of Deposition: 2021-09-01			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
7:11-14	PRIVACY		
11:15-12:3	FRE 403, MIL		FOW
13:18-21	FRE 403, V, MIL	13:22-14:11; 139:3-10	R, 403, BSD, V, FOW
15:12-18	V, C, R, FRE 403, MIL	14:16-15:5; 15:7-8; 15:10-11; 139:3-10	R, 403, BSD, V, FOW, NR
17:17-20:25	V, C, FRE 403, ARG, R, MIL	21:1-24; 22:7-18; 23:3-7; 23:15-21; 139:3-10	R, 403, BSD, V, FOW, NR
30:15-17	ARG, MIS, V, R, FRE 403, MIL	28:10-19; 30:4-9; 30:23-25; 31:2-3; 31:8-16; 32:2-33:3	R, 403, BSD, V, NR
30:20-21	ARG, MIS, V, R, FRE 403, MIL	28:10-19; 30:4-9; 30:23-25; 31:2-3; 31:8-16; 32:2-33:3	R, 403, BSD, V, NR
33:4-18	ARG, V, R, FRE 403, MIL	32:2-33:3; 33:19-34:1	R, 403, BSD, V, FOW, NR
35:10-13	V, MIS, R, FRE 403, MIL	32:2-33:3; 33:19-34:1; 35:4-9; 35:15-18; 36:23-37:16; 38:10-15	R, 403, BSD, V, FOW, NR
35:19-22	ARG, V, R, FRE 403, MIL	32:2-33:3; 33:19-34:1; 35:4-9; 35:15-18; 36:23-37:16; 38:10-15	R, 403, BSD, V, NR
35:24-36:1	ARG, V, R, FRE 403, MIL	32:2-33:3; 33:19-34:1; 35:4-9; 35:15-18; 36:23-37:16; 38:10-15	R, 403, BSD, V, NR
39:4-13	ARG, V, R, FRE 403, MIL	40:8-15; 41:3-42:14; 44:18-24; 45:14-47:14; 56:4-13; 56:21-25; 57:2-12	R, 403, BSD, V, FOW, NR, PK
65:14-15	ARG, V, FRE 403, R, MIL	62:3-15; 63:24-65:2; 65:21-66:5; 67:16-68:11	R, 403, BSD, V, NR

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Banjevic, Milena			
Date of Deposition: 2021-09-01			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
65:18-19	ARG, V, FRE 403, R, MIL	62:3-15; 63:24-65:2; 65:21-66:5; 67:16-68:11	R, 403, BSD, V, NR
70:5-71:9	ARG, C, L/SOL, R, FRE 403, MIL	69:22-70:4; 67:16-68:11; 45:14-47:14; 139:3-10	R, 403, BSD, V, FOW
71:11-72:1	ARG, C, L/SOL, R, FRE 403, MIL	69:22-70:4; 67:16-68:11; 45:14-47:14; 139:3-10	R, 403, BSD, V, NR
72:4-5	ARG, C, L/SOL, R, FRE 403, MIL	69:22-70:4; 67:16-68:11; 45:14-47:14; 139:3-10	R, 403, BSD, V, NR
72:7-72:13	ARG, C, L/SOL, R, FRE 403, MIL	69:22-70:4; 67:16-68:11; 45:14-47:14; 139:3-10	R, 403, BSD, V, NR
72:15-73:5	ARG, C, L/SOL, R, FRE 403, MIL	69:22-70:4; 67:16-68:11; 45:14-47:14; 139:3-10	R, 403, BSD, V, NR
73:7-17	ARG, C, L/SOL, R, FRE 403, MIL	69:22-70:4; 67:16-68:11; 45:14-47:14; 139:3-10	R, 403, BSD, V, NR
73:19-25	ARG, C, L/SOL, R, FRE 403, MIL	69:22-70:4; 67:16-68:11; 45:14-47:14; 139:3-10	R, 403, BSD, V, NR
74:3-8	ARG, C, L/SOL, R, FRE 403, MIL	69:22-70:4; 67:16-68:11; 45:14-47:14; 139:3-10	R, 403, BSD, V, NR
74:10-17	ARG, C, L/SOL, R, FRE 403, MIL	69:22-70:4; 67:16-68:11; 45:14-47:14; 139:3-10	R, 403, BSD, V, NR
74:19-25	ARG, C, L/SOL, R, FRE 403, MIL	69:22-70:4; 67:16-68:11; 45:14-47:14; 139:3-10	R, 403, BSD, V, NR
75:2-6	ARG, C, L/SOL, R, FRE 403, MIL	69:22-70:4; 67:16-68:11; 45:14-47:14; 139:3-10	R, 403, BSD, V, NR
75:8-9	ARG, C, L/SOL, R, FRE 403, MIL	69:22-70:4; 67:16-68:11; 45:14-47:14; 139:3-10	R, 403, BSD, V, NR

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Banjevic, Milena			
Date of Deposition: 2021-09-01			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
83:5-8	L, O, BRPL		FOW
83:11	L, O, BRPL		FOW
83:24-84:2	L, S, O, R, FRE 403, MIL	83:12-22; 89:10-22; 130:14-131:3; 133:22-134:1; 134:3-135:2; 139:3-10	R, 403, V, SPEC, OB, BSD
84:4-6	L, S, O, R, FRE 403, MIL	83:12-22; 89:10-22; 130:14-131:3; 133:22-134:1; 134:3-135:2; 139:3-10	R, 403, V, SPEC, OB, BSD
103:8-10	V, FRE 403, S, R, FRE 403, MIL	21:1-24; 30:4-9; 31:8-16; 32:2-33:3; 33:19-34:1; 44:18-24; 56:4-13; 56:21-25; 56:2-12; 120:25-121:11; 139:3-10	R, 403, V, SPEC, OB, BSD
103:12-13	V, FRE 403, S, R, FRE 403, MIL	21:1-24; 30:4-9; 31:8-16; 32:2-33:3; 33:19-34:1; 44:18-24; 56:4-13; 56:21-25; 56:2-12; 120:25-121:11; 139:3-10	R, 403, V, SPEC, OB, BSD
104:7-11	V, FRE 403, S, R, FRE 403, MIL	21:1-24; 30:4-9; 31:8-16; 32:2-33:3; 33:19-34:1; 44:18-24; 56:4-13; 56:21-25; 56:2-12; 120:25-121:11; 139:3-10	R, 403, V, SPEC, OB, BSD, FOW
106:3-4	L, ARG, C, FRE 403, MIL, R	31:8-16; 32:2-33:3; 33:19-34:1; 44:18-24; 45:14-47:14; 56:4-13; 56:21-25; 56:2-12; 63:24-65:2; 83:12-22	R, 403, V, SPEC, OB, BSD

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Banjevic, Milena			
Date of Deposition: 2021-09-01			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
106:7-14	L, ARG, C, FRE 403, MIL, R	31:8-16; 32:2-33:3; 33:19-34:1; 44:18-24; 45:14-47:14; 56:4-13; 56:21-25; 56:2-12; 63:24-65:2; 83:12-22	R, 403, V, SPEC, OB, BSD
106:18-21	L, ARG, C, FRE 403, MIL, R	31:8-16; 32:2-33:3; 33:19-34:1; 44:18-24; 45:14-47:14; 56:4-13; 56:21-25; 56:2-12; 63:24-65:2; 83:12-22	R, 403, V, SPEC, OB, BSD
107:7-19	L, ARG, C, FRE 403, MIL, R	107:20-25; 108:10-13; 109:22-25	R, 403, V, BSD, FOW
114:10-115:4	L, ARG, C, FRE 403, H, MIL, MIS, R		
118:24-119:1	L, S, V, O, R, FRE 403, MIL		FOW
119:3-12	L, S, V, O, R, FRE 403, MIL	120:10-14	FOW, 403
119:16-20	L, S, V, O, R, FRE 403, MIL	120:10-14; 139:3-10	403
120:19-21	MIS, V, L, R, FRE 403, MIL	120:10-14	403

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Brophy, Michael			
Date of Deposition: 2021-08-23			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
7:16-19	PRIVACY		
9:12-18	FRE 403		FOW
39:1-4	SC, V, ID, R	34:3-4; 37:10-38:15; 38:21-25	FOW, R, 403, I, BSD, H
39:15-21	SC, V, ID, R	34:3-4; 37:10-38:15; 38:21-25	R, 403, I, BSD, H
39:23-24	SC, V, ID, R	34:3-4; 37:10-38:15; 38:21-25	R, 403, I, BSD, H
40:2-4	SC, V, ID, R	34:3-4; 37:10-38:15; 38:21-25	R, 403, I, BSD, H
40:6-8	SC, V, ID, R	34:3-4; 37:10-38:15; 38:21-25	R, 403, I, BSD, H
41:17-20	SC, V, ID, MIS, AF, R		
41:23-42:3	SC, V, ID, MIS, AF, R		
42:14-43:13	SC, R, V		FOW
44:8-11	SC, R, V		
44:13-15	SC, R, V		
44:17-45:5	FRE 403, CD, FRE 611, SC, V, R		FOW
45:8-11	FRE 403, CD, SC, V, R		
45:13-22	FRE 403, CD, SC, V, R	45:24-46:6	R, 403
59:8-11	FRE 611, SC, CD, V, ID, AF, FN, R	57:19-59:4; 262:8-14	R, 403, BSD
59:16-19	FRE 611, SC, CD, V, ID, AF, FN, R	57:19-59:4; 262:8-14	R, 403, BSD
59:21-23	SC, V, FN, AF, ID, R		
59:25-60:3	SC, V, FN, AF, ID, R		
60:5-7	SC, V, FN, AF, ID, R		
60:9-13	SC, V, FN, AF, ID, R		
60:15-18	SC, CD, AF, FN, V, ID, R		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Brophy, Michael			
Date of Deposition: 2021-08-23			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
60:20-24	SC, CD, AF, FN, V, ID, R		
61:1-2	SC, CD, AF, FN, V, ID, R		
61:4-12	SC, CD, AF, FN, V, ID, R		
61:16-20	SC, S, AF, FN, V, ID, R	62:1-2; 62:6-8	R, 403
61:22-24	SC, S, AF, FN, V, ID, R	62:1-2; 62:6-8	R, 403
62:13-15	SC, S, AF, FN, V, O, R	62:1-2; 62:6-8	R, 403
62:17-20	SC, S, AF, FN, V, O, R		
62:24-63:2	SC, S, AF, FN, V, O, R		
63:4-7	AF, SC, FN, S, O, V, R		
63:11-15	AF, SC, FN, S, O, V, R		
63:19-22	FRE 403, AF, SC, FN, S, O, V, R		
63:24-64:4	FRE 403, AF, SC, FN, S, O, V, R		
64:6-14	FRE 403, AF, SC, FN, S, O, V, R	64:6-65:11	R, 403, OB, BSD, NR
90:10-91:6	R		FOW
165:20-21	FRE 403, SC, ID, R	161:10-21; 161: 23-162:13; 163:13-19; 163:21-164:2	R, 403, BSD, NR, V
165:23-25	FRE 403, SC, ID, R		FOW
166:19-167:5	FRE 403, 611, SC, AF, FN, R		FOW
167:8-19	FRE 403, SC, ID, V, S, R		FOW
167:22-168:7	FRE 403, SC, ID, V, S, R		FOW
168:9-15	FRE 403, SC, ID, V, S, R		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Brophy, Michael			
Date of Deposition: 2021-08-23			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
168:17-25	FRE 403, SC, ID, V, S, R		
183:24-25	FRE 801		FOW
184:5-15	FRE 801		FOW
185:16-186:7	FRE 403		FOW
193:15-194:3	SC, V, ID, R	192:1-4; 192:5-9; 192:11-17; 192:19-193:14	R, 403, BSD, V, FOW, NR
194:15-17	FRE 403, 611, MIS, SC, CD, V, R		
194:19	FRE 403, 611, MIS, SC, CD, V, R		
194:22-195:25	FRE 403, 611, 801, MIS, SC, CD, V, H		FOW
200:12-201:4	FRE 403; 801, SC, H, R		FOW
201:6-201:16	FRE 403; 801, SC, H, R	201:19-203:7	R, 403, BSD, FOW
203:8-11	SC, V, S, R		
203:15-22	SC, V, S, R		
209:4-210:11	FRE 403, SC, CD, V, MIS, ID, R	37:10-16; 38:21-25; 210:12-24; 211:2-11	R, 403, FOW, BSD, V
217:6-8	FRE 403, MIS, AF, FN, SC, S, V, ID, R	215:7-216:19; 216:21-217:4	R, 403, FOW, BSD, V
217:12-15	FRE 403, MIS, AF, FN, SC, S, V, ID, R	215:7-216:19; 216:21-217:4	R, 403, FOW, BSD, V
219:9-12	FRE 403, 611, CD, V, SC, ID		
219:14-17	FRE 403, 611, CD, V, SC, ID		
229:2	FRE 403, SC, V, ID, FN, R		FOW
229:4	FRE 403, SC, V, ID, FN, R		FOW
229:10-11	FRE 403, SC, V, ID, FN, R		FOW
229:13-25	FRE 403, SC, V, ID, FN, R	230:1-17	FOW, R, 403, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Brophy, Michael			
Date of Deposition: 2021-08-23			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
230:24-231:1	FRE 403, SC, V, ID, FN, R	231:12-14; 231:17-19	FOW, R, 403, V
231:24-232:9	FRE 403, SC, V, ID, FN, R	232:16-18; 232:21-233:2	FOW, R, 403, V, BSD
233:4-13	FRE 403, SC, V, ID, FN, R		FOW
233:21-234:8	FRE 403, SC, V, ID, FN, R, FRE 801, H		FOW
234:12-13	FRE 403, SC, V, ID, FN, R, H		
234:17-21	FRE 403, SC, V, ID, FN, R, H		
234:23	FRE 801, SC, V, S, R, H		
235:1-3	FRE 801, SC, V, S, R, H		
235:5-7	FRE 403, SC, S, R, H		
235:10-23	FRE 403, SC, S, R, H	235:24-25; 236:3-18	BSD, R, 403, V
237:4-12	FRE 403, SC;V, R	192:1-3; 192:5-9; 192:11-17; 192:19-192:14	FOW, BSD, R, 403, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Constantin, Tudor			
Date of Deposition: 2021-08-04			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
8:22-9:1	PRIVACY		
10:16-11:12	FRE 403, FRE 1002-1003, ID, R		FOW
14:14-21	R, FRE 403, FN		FOW
16:3-5	R, FRE 403		FOW
16:22-17:10	V		FOW
17:19-21	V, R, FRE 403, ID	17:22-18:11	OB, R, 403, FOW
20:8-21:2	V, FRE 403, ID	18:24-19:23; 23:17-25:6	OB, R, 403, BSD, NR, V, FOW
21:9-25	R, FRE 403, ID, V	21:3-8	R, 403, O, V, FOW
84:21-23	FN, R, ID, FRE 403		FOW
86:14-15	L, O, R, FRE 403, ID		FOW
86:24	L, O, R, FRE 403, ID, MIL		FOW
87:2-4	L, O, R, FRE 403, ID, MIL	87:23-88:9; 88:11-17	OB, R, 403
87:7-10	L, O, R, FRE 403, ID, MIL	87:23-88:9; 88:11-17	OB, R, 403
87:12-15	L, O, ARG, MIS, R, FRE 403, ID, MIL	87:23-88:9; 88:11-17	OB, R, 403
87:18-21	L, O, ARG, MIS, R, FRE 403, ID, MIL	87:23-88:9; 88:11-17	OB, R, 403
90:2-5	R, FRE 403, ID, FN		FOW
91:20-21	L, O, ARG, MIS, R, FRE 403, ID, MIL	96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V
91:25-92:3	L, O, ARG, MIS, R, FRE 403, ID, MIL	96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V
92:5-8	L, O, ARG, MIS, R, FRE 403, ID, MIL	95:4-14; 96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V
92:12-14	L, O, ARG, MIS, R, FRE 403, ID, MIL	95:4-14; 96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V
92:16-25	L, O, ARG, MIS, R, FRE 403, ID, MIL, PRIV	95:4-14; 96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Constantin, Tudor			
Date of Deposition: 2021-08-04			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
93:2-15	L, O, ARG, MIS, R, FRE 403, ID, MIL, OBJ, PRIV	95:4-14; 96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V
93:24-94:21	L, O, ARG, MIS, R, FRE 403, ID, MIL, OBJ, PRIV	95:4-14; 96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V
97:22-25	L, O, ARG, MIS, R, FRE 403, ID, MIL, OBJ, PRIV	95:4-14; 96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V
98:2-7	L, O, ARG, MIS, R, FRE 403, ID, MIL, OBJ, PRIV	95:4-14; 96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V, FOW
101:21-23	L, O, ARG, MIS, R, FRE 403, ID, MIL, OBJ, PRIV	87:23-88:9; 88:11-17; 95:4-14; 96:6-14; 98:8-18; 99:1-17; 101:24-102:1	OB, R, 403, I, BSD, NR, V
102:2	L, O, ARG, MIS, R, FRE 403, ID, MIL, OBJ, PRIV	87:23-88:9; 88:11-17; 95:4-14; 96:6-14; 98:8-18; 99:1-17; 102:8-12	OB, R, 403, I, BSD, NR, V
102:4-7	L, O, ARG, MIS, R, FRE 403, ID, MIL, OBJ, PRIV	87:23-88:9; 88:11-17; 95:4-14; 96:6-14; 98:8-18; 99:1-17	FOW, OB, R, 403, I, BSD, NR, V
102:13-15	L, O, ARG, MIS, R, FRE 403, ID, MIL, OBJ, PRIV	87:23-88:9; 88:11-17; 95:4-14; 96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V
102:17-22	L, O, ARG, MIS, R, FRE 403, ID, MIL, OBJ, PRIV	87:23-88:9; 88:11-17; 95:4-14; 96:6-14; 98:8-18; 99:1-17	FOW, OB, R, 403, I, BSD, NR, V
102:24	L, O, ARG, MIS, R, FRE 403, ID, MIL, OBJ, PRIV	87:23-88:9; 88:11-17; 95:4-14; 96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V
103:11-13	L, O, ARG, MIS, R, FRE 403, ID, MIL, OBJ, PRIV, V	87:23-88:9; 88:11-17; 95:4-14; 96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V
103:15-17	L, O, ARG, MIS, R, FRE 403, ID, MIL, OBJ, PRIV	87:23-88:9; 88:11-17; 95:4-14; 96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Constantin, Tudor			
Date of Deposition: 2021-08-04			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
104:7-11	L, O, ARG, MIS, R, FRE 403, ID, MIL, OBJ, PRIV	95:4-14; 96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V
104:13	L, O, ARG, MIS, R, FRE 403, ID, MIL, OBJ, PRIV	95:4-14; 96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V
104:20-105:4	R, FRE 403, ID		FOW
105:11-14	L, O, ARG, R, FRE 403, ID, MIL, OBJ, PRIV		FOW
108:12-109:8	L, O, ARG, R, FRE 403, ID, MIL, OBJ, PRIV	95:4-14; 96:6-14; 98:8-18; 99:1-17	FOW, OB, R, 403, I, BSD, NR, V
110:11-15	L, O, V, R, FRE 403, ID		FOW
110:17	L, O, V, R, FRE 403, ID		
111:15-17	L, O, R, FRE 403, ID, MIL, OBJ, PRIV	95:4-14; 96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V
111:20-23	L, O, R, FRE 403, ID, MIL, OBJ, PRIV	95:4-14; 96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V
115:3-9	L, O, V, R, FRE 403, ID		FOW
115:14-20	L, O, R, FRE 403, ID, MIL, OBJ, PRIV	115:21-22; 115:25-116:3; 95:4-14; 96:6-14; 98:8-18; 99:1-17	FOW, OB, R, 403, I, BSD, NR, V
116:4-6	L, O, R, FRE 403, ID, MIL, OBJ, PRIV	95:4-14; 96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V
116:8-17	L, O, R, FRE 403, ID, MIL, OBJ, PRIV	95:4-14; 96:6-14; 98:8-18; 99:1-17; 119:9-18; 119:20-120:3	OB, R, 403, I, BSD, NR, V
116:19-117:10	L, O, R, FRE 403, ID, MIL, OBJ, PRIV	95:4-14; 96:6-14; 98:8-18; 99:1-17; 119:9-18; 119:20-120:3	OB, R, 403, I, BSD, NR, V
117:12-16	L, O, R, FRE 403, ID, MIL, OBJ, PRIV	95:4-14; 96:6-14; 98:8-18; 99:1-17;	OB, R, 403, I, BSD, NR, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Constantin, Tudor			
Date of Deposition: 2021-08-04			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
		119:9-18; 119:20-120:3	
117:19-20	L, O, R, FRE 403, ID, MIL, OBJ, PRIV	95:4-14; 96:6-14; 98:8-18; 99:1-17; 119:9-18; 119:20-120:3	OB, R, 403, I, BSD, NR, V
117:22-24	L, O, R, FRE 403, ID, MIL, OBJ, PRIV	95:4-14; 96:6-14; 98:8-18; 99:1-17; 119:9-18; 119:20-120:3	OB, R, 403, I, BSD, NR, V
118:2-3	L, O, R, FRE 403, ID, MIL, OBJ, PRIV	95:4-14; 96:6-14; 98:8-18; 99:1-17; 119:9-18; 119:20-120:3	OB, R, 403, I, BSD, NR, V
118:5-8	L, O, R, FRE 403, ID, MIL, OBJ, PRIV	95:4-14; 96:6-14; 98:8-18; 99:1-17; 119:9-18; 119:20-120:3	OB, R, 403, I, BSD, NR, V
118:11-12	L, O, R, FRE 403, ID, MIL, OBJ, PRIV	95:4-14; 96:6-14; 98:8-18; 99:1-17; 119:9-18; 119:20-120:3	OB, R, 403, I, BSD, NR, V
118:14-17	L, O, R, FRE 403, ID, MIL, OBJ, PRIV	119:9-18; 119:20-120:3; 95:4-14; 96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V
118:21	L, O, R, FRE 403, ID, MIL, OBJ, PRIV	119:9-18; 119:20-120:3; 95:4-14; 96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V
118:23	L, O, R, FRE 403, ID, MIL, OBJ, PRIV	119:9-18; 119:20-120:3; 95:4-14; 96:6-14; 98:8-18; 99:1-17	OB, R, 403, I, BSD, NR, V
122:17-18	AF, FN, V, F, S, R, FRE 403, MIL		
122:21	AF, FN, V, F, S, R, FRE 403, MIL		
122:23-123:3	AF, FN, S, R, FRE 403, MIL, L, ID		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Constantin, Tudor			
Date of Deposition: 2021-08-04			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
123:17-19	AF, FN, V, F, S, R, FRE 403, MIL	124:3-8	
123:22-23	AF, FN, V, F, S, R, FRE 403, MIL	124:3-8	
124:11-20	AF, FN, V, F, S, R, FRE 403, MIL	124:3-9, 129:11-15, 132:6-10, 132:19-25, 133:1-17, 135:6-16	OB, R, 403, I, BSD, NR, V
126:7-10	AF, FN, V, F, S, R, FRE 403, MIL	124:3-9, 129:11-15, 132:6-10, 132:19-25, 133:1-17, 135:6-16	OB, R, 403, I, BSD, NR, V
126:13-14	AF, FN, V, F, S, R, FRE 403, MIL	124:3-9, 129:11-15, 132:6-10, 132:19-25, 133:1-17, 135:6-16	OB, R, 403, I, BSD, NR, V
126:16-19	AF, FN, V, F, S, R, FRE 403, MIL	124:3-9, 129:11-15, 132:6-10, 132:19-25, 133:1-17, 135:6-16	OB, R, 403, I, BSD, NR, V
126:22	AF, FN, V, F, S, R, FRE 403, MIL	124:3-9, 129:11-15, 132:6-10, 132:19-25, 133:1-17, 135:6-16	OB, R, 403, I, BSD, NR, V
128:1-3	AF, FN, S, R, FRE 403, MIL, L, ID		
128:20-24	AF, FN, V, F, S, R, FRE 403, MIL, ID	129:11-15	
129:2-6	AF, FN, V, F, S, R, FRE 403, MIL, ID	129:11-15	
129:8-9	AF, FN, V, F, S, R, FRE 403, MIL, ID	129:11-15	
130:2-5	AF, FN, V, F, S, R, FRE 403, MIL, ID	130:6-14	FOW, OB, R, 403, NR
130:15-17	AF, FN, S, R, FRE 403, MIL, L, ID		FOW
130:23-25	AF, FN, V, F, S, R, FRE 403, MIL, ID	129:11-15, 132:6-10, 132:19-25, 133:1-17, 135:6-16	OB, R, 403, I, BSD, NR, V
131:12-15	AF, FN, V, F, S, R, FRE 403, MIL, ID	129:11-15, 132:6-10, 132:19-25, 133:1-17, 135:6-16	OB, R, 403, I, BSD, NR, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Constantin, Tudor			
Date of Deposition: 2021-08-04			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
131:18-19	AF, FN, V, F, S, R, FRE 403, MIL, ID	129:11-15, 132:6-10, 132:19-25, 133:1-17, 135:6-16	OB, R, 403, I, BSD, NR, V
135:25-136:2	AF, FN, S, R, FRE 403, MIL, L, ID		FOW
136:18-25	AF, FN, S, R, FRE 403, MIL, L, ID	129:11-15, 132:6-10, 132:19-25, 133:1-17, 135:6-16	FOW, OB, R, 403, I, BSD, NR, V
137:12-16	AF, FN, S, R, FRE 403, MIL, L, ID	129:11-15, 132:6-10, 132:19-25, 133:1-17, 135:6-16	FOW, OB, R, 403, I, BSD, NR, V
137:23-138:1	AF, FN, S, R, FRE 403, MIL, L, ID	129:11-15, 132:6-10, 132:19-25, 133:1-17, 135:6-16	FOW, OB, R, 403, I, BSD, NR, V
138:3-16	AF, FN, S, R, FRE 403, MIL, L, ID	129:11-15, 132:6-10, 132:19-25, 133:1-17, 135:6-16	FOW, OB, R, 403, I, BSD, NR, V
138:17-18	AF, FN, S, R, FRE 403, MIL, L, ID	129:11-15, 132:6-10, 132:19-25, 133:1-17, 135:6-16	FOW, OB, R, 403, I, BSD, NR, V
139:9-13	AF, FN, S, R, FRE 403, MIL, L, ID	129:11-15, 132:6-10, 132:19-25, 133:1-17, 135:6-16, 141:20-141:2	FOW, OB, R, 403, I, BSD, NR, V
140:20-141:5	AF, FN, S, R, FRE 403, MIL, L, ID	129:11-15, 132:6-10, 132:19-25, 133:1-17, 135:6-16, 141:20-141:2	FOW, OB, R, 403, I, BSD, NR, V
141:8-19	AF, FN, S, R, FRE 403, MIL, L, ID	141:20-141:2, 129:11-15, 132:6-10, 132:19-25, 133:1-17, 135:6-16	FOW, OB, R, 403, I, BSD, NR, V
142:4-7	AF, FN, S, R, FRE 403, MIL, L, ID	142:13-18	OB, R, 403
142:10-11	AF, FN, S, R, FRE 403, MIL, L, ID	142:13-18	OB, R, 403
143:13-20	AF, FN, S, R, FRE 403, MIL, L, ID	142:13-18	FOW, OB, R, 403

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Constantin, Tudor			
Date of Deposition: 2021-08-04			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
143:23-24	AF, FN, S, R, FRE 403, MIL, L, ID	142:13-18	OB, R, 403
145:5-7	AF, FN, S, R, FRE 403, MIL, L, ID	144:17-145:3	OB, R, 403
145:10-11	AF, FN, S, R, FRE 403, MIL, L, ID	144:17-145:3	OB, R, 403
145:15-16	AF, FN, S, R, FRE 403, MIL, L, ID	144:17-145:3	OB, R, 403

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Demko, Zachary			
Date of Deposition: 2021-08-10			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
8:16-19	PRIVACY		
11:21-22	FN, S, R, FRE 403		
11:25-12:1	FN, S, R, FRE 403		
12:3-5	FN, S, R, FRE 403		
12:8-9	FN, S, O, R, FRE 403		
12:11-12	FN, S, O, R, FRE 403		
12:15-20	FN, S, O, R, FRE 403		
12:22-23	FN, S, O, R, FRE 403		
13:1-8	FN, S, O, R, FRE 403		
13:22-14:17	FN, S, O, R, FRE 403		FOW
16:24-17:3	R, FRE 403, MIL		FOW
18:12-15	R, FRE 403, MIL, H		FOW
19:3-9	R, FRE 403, MIL, H		FOW
19:14-21	FRE 403, R		FOW
20:9-21:3	FRE 403, V, R, MIL	21:14-21; 21:23-22:8; 25:6-24; 26:4-13; 26:25-27:2	R, 403, BSD, OB, SPEC, V
21:5-10	FRE 403, V, R, MIL	21:14-21; 21:23-22:8; 25:6-24; 26:4-13; 26:25-27:2	R, 403, BSD, OB, SPEC, V
21:12-13	FRE 403, V, FN, R, MIL	21:14-21; 21:23-22:8; 25:6-24; 26:4-13; 26:25-27:2	R, 403, BSD, FOW, OB, SPEC, V
23:6-10	MIS, V, R, FRE 403, MIL	21:14-21; 21:23-22:8; 25:6-24; 26:4-13; 26:25-27:2	R, 403, BSD, OB, SPEC, V
23:16-20	MIS, V, R, FRE 403, MIL	21:14-21; 21:23-22:8; 25:6-24; 26:4-13; 26:25-27:2	R, 403, BSD, OB, SPEC, V
23:22-24	MIS, V, R, FRE 403, MIL	21:14-21; 21:23-22:8; 25:6-24; 26:4-13; 26:25-27:2	R, 403, BSD, OB, SPEC, V
24:2-4	MIS, V, R, FRE 403, MIL	21:14-21; 21:23-22:8; 25:6-24; 26:4-13; 26:25-27:2	R, 403, BSD, OB, SPEC, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Demko, Zachary			
Date of Deposition: 2021-08-10			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
24:6-8	V, FN, R, FRE 403, MIL	21:14-21; 21:23-22:8; 25:6-24; 26:4-13; 26:25-27:2	R, 403, BSD, OB, SPEC, V
24:15-18	V, FN, R, FRE 403, MIL	21:14-21; 21:23-22:8; 25:6-24; 26:4-13; 26:25-27:2	R, 403, BSD, OB, SPEC, V
24:20-23	ARG, R, FRE 403, MIL	21:14-21; 21:23-22:8; 25:6-24; 26:4-13; 26:25-27:2	R, 403, BSD, OB, SPEC, V
25:3-4	ARG, R, FRE 403, MIL	21:14-21; 21:23-22:8; 25:6-24; 26:4-13; 26:25-27:2	R, 403, BSD, OB, SPEC, V
35:8-16	V, FRE 403, R, FRE 403		
35:18-19	V, FRE 403, R, FRE 403		
35:21-24	V, FRE 403, R, FRE 403		FOW
63:5-8	FN, O, V, L/SOL, R, FRE 403, MIL		
63:11-12	FN, O, V, L/SOL, R, FRE 403, MIL		
65:1-7	FN, O, V, L/SOL, R, FRE 403, MIL	21:14-21; 21:23-22:8; 25:6-24; 26:4-13; 26:25-27:2	R, 403, BSD, FOW, OB, SPEC, V
65:14-20	FN, O, V, L/SOL, R, FRE 403, MIL		
65:23	FN, O, V, L/SOL, R, FRE 403, MIL		
65:25-66:3	FN, O, V, L/SOL, R, FRE 403, MIL		
66:6	FN, O, V, L/SOL, R, FRE 403, MIL		
66:8-17	FN, O, V, L/SOL, R, FRE 403, MIL		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Demko, Zachary			
Date of Deposition: 2021-08-10			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
66:20-21	FN, O, V, L/SOL, R, FRE 403, MIL		
68:2-16	FN, O, R, FRE 403		FOW
68:19-22	FN, O, R, FRE 403		FOW
68:23-69:16	FN, O, R, FRE 403		FOW
69:19-25	FN, O, R, FRE 403		FOW
70:2-5	FN, O, R, FRE 403		
70:8-12	FN, O, R, FRE 403		
70:14-15	FN, O, R, FRE 403		
70:18-22	FN, O, R, FRE 403		
70:24-71:1	FN, O, R, FRE 403		
71:5-6	FN, O, R, FRE 403		
72:17-20	FN, O, R, FRE 403, MIL		FOW
72:23-25	FN, O, R, FRE 403, MIL		
73:2-3	FN, O, S, V, R, FRE 403, MIL	73:20-25; 74:2-4; 74:7-14; 74:17-20; 75:18-25	R, 403, BSD, OB, SPEC, V
73:6-7	FN, O, S, V, R, FRE 403, MIL	73:20-25; 74:2-4; 74:7-14; 74:17-20; 75:18-25	R, 403, BSD, OB, SPEC, V
73:9-10	FN, O, S, V, R, FRE 403, MIL	73:20-25; 74:2-4; 74:7-14; 74:17-20; 75:18-25	R, 403, BSD, OB, SPEC, V
73:12-13	FN, O, S, V, R, FRE 403, MIL	73:20-25; 74:2-4; 74:7-14; 74:17-20; 75:18-25	R, 403, BSD, OB, SPEC, V
73:14-15	FN, O, S, V, R, FRE 403, MIL	73:20-25; 74:2-4; 74:7-14; 74:17-20; 75:18-25	R, 403, BSD, OB, SPEC, V
73:17-18	FN, O, S, V, R, FRE 403, MIL	73:20-25; 74:2-4; 74:7-14; 74:17-20; 75:18-25	R, 403, BSD, OB, SPEC, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Demko, Zachary			
Date of Deposition: 2021-08-10			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
75:6-14	FN, S, V, R, FRE 403, MIL	73:20-25; 74:2-4; 74:7-14; 74:17-20; 75:18-25	R, 403, BSD, FOW, OB, SPEC, V
78:5-9	F, S, ARG, L/SOL, R, FRE 403, MIL		
78:12-23	F, S, ARG, L/SOL, R, FRE 403, MIL		
79:8-10	F, S, ARG, L/SOL, R, FRE 403, MIL		
79:15-20	F, S, ARG, L/SOL, R, FRE 403, MIL		
79:22-24	F, S, ARG, L/SOL, R, FRE 403, MIL		
80:2-15	F, S, ARG, L/SOL, R, FRE 403, MIL		FOW
82:1-12	F, S, ARG, L, R, FRE 403		FOW
82:15-17	F, S, ARG, L, R, FRE 403		
82:20-22	F, S, ARG, L, R, FRE 403		
93:3-10	FN, L, O, R, FRE 403, MIL	107:9-15	FOW, 403, BSD, F, OB
93:12-17	FN, L, O, R, FRE 403, MIL	107:9-15	403, BSD, F, OB
93:21-24	FN, L, O, R, FRE 403, MIL	107:9-15	403, BSD, F, OB
94:3-5	FN, L, O, R, FRE 403, MIL	107:9-15	403, BSD, F, OB
97:19-98:18	FN, L, O, OBJ, R, FRE 403, MIL	107:9-15	403, BSD, F, OB
103:6-14	MIS, S, L	107:9-15	403, BSD, F, OB
103:17	MIS, S, L, R, FRE 403, MIL	107:9-15	403, BSD, F, OB
103:19-104:5	MIS, S, L, FN, R, FRE 403, MIL	107:9-15	FOW, 403, BSD, F, OB

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Demko, Zachary			
Date of Deposition: 2021-08-10			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
104:11-14	S, L, FN, R, FRE 403, MIL	107:9-15	FOW, 403, BSD, F, OB
104:17-19	S, L, FN, R, FRE 403, MIL	107:9-15	403, BSD, F, OB
104:22	S, L, FN, R, FRE 403, MIL	107:9-15	403, BSD, F, OB
104:25-105:2	S, L, FN, ARG, R, FRE 403, MIL	107:9-15	403, BSD, F, OB
105:5	S, L, FN, ARG, R, FRE 403, MIL	107:9-15	403, BSD, F, OB
105:7-12	ARG, S, FN, R, FRE 403, MIL	107:9-15	FOW, 403, BSD, F, OB
105:17-19	ARG, S, FN, R, FRE 403, MIL	107:9-15	403, BSD, F, OB
105:22	ARG, S, FN, R, FRE 403, MIL	107:9-15	403, BSD, F, OB
105:25-106:2	ARG, S, FN, R, FRE 403, MIL	107:9-15	403, BSD, F, OB
106:5-6	ARG, S, FN, R, FRE 403, MIL	107:9-15	403, BSD, F, OB
106:8-11	ARG, S, FN, R, FRE 403, MIL	107:9-15	403, BSD, F, OB
106:14-16	ARG, S, FN, R, FRE 403, MIL	107:9-15	403, BSD, F, OB
113:12-14	V, L, O, FN, R, FRE 403		
113:17-21	V, L, O, FN, R, FRE 403		
113:23-25	V, L, O, FN, R, FRE 403		
114:3-5	V, L, O, FN, R, FRE 403		
115:1-9	V, MIS, R, FRE 403		FOW
115:12-13	V, MIS, R, FRE 403	116:8-22	R, 403, BSD
117:2-6	L, FN, S, O, R, FRE 403, MIL		
117:9	L, FN, S, O, R, FRE 403, MIL		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Demko, Zachary			
Date of Deposition: 2021-08-10			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
117:11-17	L, FN, S, O, R, FRE 403, MIL		
117:20-118:2	L, FN, S, O, R, FRE 403, MIL		
118:5-7	L, FN, S, O, R, FRE 403, MIL		
119:16-120:10	FN, L, O, R, FRE 403		FOW
120:13	FN, L, O, R, FRE 403		
120:15-17	FN, L, O, R, FRE 403		
120:20-121:8	FN, L, O, F, ARG		
121:11-19	FN, L, O, F, ARG, FRE 403		
121:22-122:2	FN, L, O, F, ARG, R, FRE 403		
122:17-19	O, S, L/ SOL, R, FRE 403, MIL		
122:22-24	O, S, L/ SOL, R, FRE 403, MIL		
123:1-7	O, S, L/ SOL, R, FRE 403, MIL		FOW
123:10-11	O, S, L/ SOL, R, FRE 403, MIL		
128:17-129:2	MIS, O, R, FRE 403	128:5-6; 128:9-15	R, 403, V
129:6-12	FN, L, O, V, R, FRE 403		
129:16-130:7	FN, L, O, V, ARG, R, FRE 403		
131:4-9	AF, FN, O, OBJ, R, FRE 403	130:20-131:3	R, 403, V
131:13-15	AF, FN, O, OBJ, ARG, R, FRE 403		
131:18-20	ARG, FN, O, S, R, FRE 403		
134:9-11	S, O, FN, R, FRE 403		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Demko, Zachary			
Date of Deposition: 2021-08-10			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
134:14	S, O, FN, R, FRE 403		
135:13-15	S, O, FN, R, FRE 403		
135:18-20	S, O, FN, R, FRE 403		
136:3-10	S, O, FN, R, FRE 403		
136:13-15	S, O, FN, R, FRE 403		
136:17-20	S, O, FN, R, FRE 403		
136:24-25	S, O, FN, R, FRE 403		
137:2-7	S, O, FN, MIS, R, FRE 403		
137:11-12	S, O, FN, MIS, R, FRE 403		
137:14-20	FN, O, L, R, FRE 403		
137:23-25	FN, O, L, R, FRE 403		
138:1-3	FN, O, L, R, FRE 403		
138:7-13	FN, O, L, R, FRE 403		
138:18-20	FN, O, L, R, FRE 403		
138:24-25	FN, O, L, R, FRE 403		
139:1-9	FN, L, R, FRE 403		
139:13-14	FN, L, R, FRE 403		
139:22-140:2			FOW
140:5-22	MIS, V, L, O, S, R, FRE 403		
141:1-16	MIS, V, L, O, S, R, FRE 403		
141:20-24	MIS, V, L, O, S, R, FRE 403		
142:3-4	MIS, V, L, O, S, R, FRE 403		
142:6-7	V, L, O, S, R, FRE 403		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Demko, Zachary			
Date of Deposition: 2021-08-10			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
142:11-12	V, L, O, S, R, FRE 403		
142:14-143:13	V, L, O, S, R, FRE 403		
143:16	V, L, O, S, R, FRE 403		
146:4-6	FN, AF, V, R, FRE 403, MIL	21:14-21; 21:23-22:8; 25:6-24; 26:4-13; 26:25-27:2	R, 403, BSD, OB, SPEC, V
146:9-13	FN, AF, V, R, FRE 403, MIL	21:14-21; 21:23-22:8; 25:6-24; 26:4-13; 26:25-27:2	R, 403, BSD, OB, SPEC, V
150:10-14	O, FN, L, ARG, R, FRE 403		
150:18-151:2	O, FN, L, ARG, R, FRE 403		
151:4-14	O, FN, L, ARG, R, FRE 403		
151:16-22	IH, AF, O, R, FRE 403		
152:1-12	IH, AF, O, R, FRE 403		
153:10-154:8	FN, O, S, R, FRE 403		
154:11	FN, O, S, R, FRE 403		
154:13-20	FN, O, S, R, FRE 403		
154:23-24	FN, O, S, R, FRE 403		
157:3-4	R, FRE 403, MIL		FOW
157:6-9	R, FRE 403, MIL		FOW
157:12	R, FRE 403, MIL		FOW
157:14-19	OBJ, MIS, V, R, FRE 403, MIL		FOW
158:12-15	OBJ, MIS, V, R, FRE 403, MIL		
158:19-159:8	OBJ, ARG, R, FRE 403, MIL		
159:14-15	OBJ, ARG, R, FRE 403, MIL		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Demko, Zachary			
Date of Deposition: 2021-08-10			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
159:17-18	ARG, R, FRE 493, MIL		
159:22-24	ARG, R, FRE 493, MIL		
161:1-6	ARG, R, FRE 493, MIL		FOW
162:15-20	ARG, C, L, R, FRE 403, MIL		
162:24-163:2	ARG, C, L, R, FRE 403, MIL		
163:4-6	ARG, C, L, R, FRE 403, MIL		
163:10-15	ARG, C, L, R, FRE 403, MIL		
163:18-164:1	ARG, C, L, R, FRE 403, MIL		
164:3-6	ARG, C, L, R, FRE 403, MIL		
164:12-19	ARG, C, L, R, FRE 403, MIL		
164:21-24	ARG, C, L, R, FRE 403, MIL		
165:1-9	ARG, C, L, R, FRE 403, MIL		
165:12	ARG, C, L, R, FRE 403, MIL		
166:18-25	AF, O, L/SOL, R, FRE 403, MIL	168:13-25	R, 403, BSD, OB, SPEC, V
167:4-6	AF, O, L/SOL, R, FRE 403, MIL	168:13-25	R, 403, BSD, OB, SPEC, V
167:8-10	AF, O, L/SOL, R, FRE 403, MIL	168:13-25	R, 403, BSD, OB, SPEC, V
167:14-24	AF, O, L/SOL, R, FRE 403, MIL	168:13-25	R, 403, BSD, OB, SPEC, V
168:3-9	AF, O, H, L/SOL, R, FRE 403, MIL	168:13-25	R, 403, BSD, OB, SPEC, V
172:20-25	O, H, L/SOL, R, FRE 403, MIL		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Demko, Zachary			
Date of Deposition: 2021-08-10			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
173:3-5	O, H, L/SOL, R, FRE 403, MIL		
174:11-12	O, L/SOL, R, FRE 403, MIL		
174:15-17	O, L/SOL, R, FRE 403, MIL		
174:20-24	O, L/SOL, R, FRE 403, MIL		
175:1-4	AF, H, O, L/SOL, R, FRE 403, MIL		
175:8-10	AF, H, O, L/SOL, R, FRE 403, MIL		
175:12-13	AF, H, O, L/SOL, R, FRE 403, MIL		
175:17	AF, H, O, L/SOL, R, FRE 403, MIL		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Dodd, Michael			
Date of Deposition: 2021-08-25			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
6:14-18	PRIVACY		
13:23-14:7	R, FRE 403, MIL; ID	14:8-12; 15:23-16:16; 17:8-17	FOW, OB, BSD, 403
41:6-9	FRE 403, AF, FN, CD, V, ID, R, MIL	22:2-17; 23:11-24:11; 24:21-25:4; 28:13-31:7; 37:14-39:3; 41:23-42:6	R, 403, BSD, V
41:12-21	FRE 403, AF, FN, CD, V, ID, R, MIL	22:2-17; 23:11-24:11; 24:21-25:4; 28:13-31:7; 37:14-39:3; 41:23-42:6	R, 403, BSD, V
42:15-24	FRE 403, L, MIL	22:2-17; 23:11-24:11; 24:21-25:4; 28:13-31:7; 37:14-39:3; 41:23-42:6	FOW, R, 403, BSD, V
44:10-13	FRE 403, AF, FN, V, R		FOW
58:8-9	FRE 403, AF, FN, V, L, O		
58:12-14	FRE 403, L, O		
58:22-59:1	FRE 403, L, O		
59:4-6	FRE 403, L, O		
59:19-60:4	FRE 403, L, O, ID	60:5-13; 63:14-19	FOW, R, 403, OB, V
60:21-22	FRE 403, ARG, V, L		
60:25-61:5	FRE 403, ARG, V, L, ID	62:1-9	R, 403, OB, V
61:8-9	FRE 403, ARG, V, L, ID	62:1-9	R, 403, OB, V
63:21-64:7	FRE 403, ARG, O, ID	65:7-18; 65:20-66:1; 66:3-4; 66:7-9	R, 403, BSD, OB, V
64:10-16	FRE 403, ARG, O, S, ID	65:7-18; 65:20-66:1; 66:3-4; 66:7-9	R, 403, BSD, OB, V
66:11-13	FRE 403, L, O		
66:17-66:25	FRE 403, L, O, S		
67:4-9	FRE 403, L, O, S		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Dodd, Michael			
Date of Deposition: 2021-08-25			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
78:5-6	FRE 403, AF, FN, L, V, MIL, R, O, ID	77:9-78:4; 79:2-12	R, 403, OB, SPEC, V
78:8-12	FRE 403, AF, FN, L, V, MIL, R, O, ID	77:9-78:4; 79:2-12	R, 403, OB, SPEC, V
78:14-16	FRE 403, AF, FN, L, V, MIL, R, O, ID	77:9-78:4; 79:2-12	R, 403, OB, SPEC, V
79:18-20	FRE 403, AF, FN, L, V, MIL, R, O, ID	77:9-78:4; 79:2-12	R, 403, OB, SPEC, V
79:23-24	FRE 403, AF, FN, L, V, MIL, R, O, ID	77:9-78:4; 79:2-12	R, 403, OB, SPEC, V
80:1-2	FRE 403, AF, FN, L, V, MIL, R, O, ID	77:9-78:4; 79:2-12	R, 403, OB, SPEC, V
80:4-5	FRE 403, AF, FN, L, V, MIL, R, O, MIS, S, ID	77:9-78:4; 79:2-12	R, 403, OB, SPEC, V
80:9-11	FRE 403, AF, FN, L, V, MIL, R, O, MIS, S, ID	77:9-78:4; 79:2-12	R, 403, OB, SPEC, V
102:6-15	R, FRE 403, MIL		FOW
102:17	R, FRE 403, MIL		FOW
103:19-104:2	FRE 403, V, MIS, S, O, MIL, R		
104:5-25	FRE 403, V, MIS, S, O, CD, L, MIL, R		
105:3-19	FRE 403, V, MIS, S, O, CD, L, MIL, R		
105:22-106:2	FRE 403, V, MIS, S, O, CD, L, MIL, R		
109:1-9	FRE 403, V, L, R, MIL	108:13-25	R, 403, BSD, SPEC, V
109:11-13	FRE 403, V, L, R, MIL	108:13-25	R, 403, BSD, SPEC, V
129:12-13	V, BRPL, H, S, FN, AF, O		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Dodd, Michael			
Date of Deposition: 2021-08-25			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
129:15-21	FRE 403, AF, FN, S, O, L, BRPL, H		
129:24-130:6	FRE 403, AF, FN, S, O, L, BRPL, H		
130:9-12	FRE 403, AF, FN, S, O, L, BRPL, H		
130:14-15	FRE 403, AF, FN, S, O, L, BRPL, H		
130:18-25	FRE 403, AF, FN, S, O, L, BRPL, H		
131:3-6	FRE 403, AF, FN, S, O, L, BRPL, H		
134:24-135:1	FRE 402, 403, AF, FN, S, O, L, ARG	135:13-136:14; 137:3-10; 137:12-21	R, 403, BSD, OB, SPEC, V
135:4-11	FRE 402, 403, AF, FN, S, O, L, ARG	135:13-136:14; 137:3-10; 137:12-21	R, 403, BSD, OB, SPEC, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Eubank, Lane			
Date of Deposition: 2021-08-06			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
6:14-17	PRIVACY		
13:20-22	R, FRE 403, MIL	13:13-14; 13:16-17	R, 403, FOW, V
14:25-15:4	R, FRE 403, MIL		FOW
15:22-16:3	V, R, FRE 403, MIL, S	16:15-23; 26:19-27:24	R, 403, BSD, FOW, OB, V
57:2-5	AF, FN, L, O, R, FRE 403, MIL		FOW
58:1-10	AF, FN, L, O, R, FRE 403, MIL	75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, FOW, V
58:19-20	AF, FN, L, O, R, FRE 403, MIL	75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, V
58:23-24	AF, FN, L, O, R, FRE 403, MIL	75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, V
59:2-4	AF, FN, L, O, R, FRE 403, MIL, MIS, ARG	78:25-79:11; 75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, V
59:7-8	AF, FN, L, O, R, FRE 403, MIL, MIS, ARG	75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9;	R, 403, BSD, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Eubank, Lane			
Date of Deposition: 2021-08-06			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
		78:18-21; 78:23; 78:25-79:11	
59:13-17	AF, FN, L, O, R, FRE 403, MIL		FOW
59:22-60:1	AF, FN, L, O, R, FRE 403, MIL	75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, FOW, L, V
60:6-7	AF, FN, L, O, R, FRE 403, MIL	75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, L, V
60:10-15	AF, FN, L, O, R, FRE 403, MIL, MIS, ARG	78:25-79:11; 75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, L, V
60:18	AF, FN, L, O, R, FRE 403, MIL, MIS, ARG	75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, L, V
60:21	AF, FN, L, O, R, FRE 403, MIL, MIS, ARG	75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, L, V
61:2-4	AF, FN, L, O, R, FRE 403, MIL		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Eubank, Lane			
Date of Deposition: 2021-08-06			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
61:9-13	AF, FN, L, O, R, FRE 403, MIL	75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, FOW, L, V
61:17-18	AF, FN, L, O, R, FRE 403, MIL	75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, L, V
61:21-22	AF, FN, L, O, R, FRE 403, MIL	75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, L, V
61:24-62:1	AF, FN, L, O, R, FRE 403, MIL, MIS, ARG	78:25-79:11; 75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, L, V
62:4-8	AF, FN, L, O, R, FRE 403, MIL, MIS, ARG	75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, L, V
62:12-14	AF, FN, L, O, R, FRE 403, MIL, MIS, ARG	62:9-11; 75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, L, OB, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Eubank, Lane			
Date of Deposition: 2021-08-06			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
62:16-17	AF, FN, L, O, R, FRE 403, MIL		FOW
62:19-22	AF, FN, L, O, R, FRE 403, MIL		FOW
63:8-14	AF, FN, L, O, R, FRE 403, MIL	75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, FOW, L, V
66:12	AF, FN, L, O, R, FRE 403, MIL, PRIV	66:13-16; 63:15-23; 64:23-65:7; 75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, L, OB, PK, V
66:17-22	AF, FN, L, O, R, FRE 403, MIL, PRIV	66:23-67:2; 63:15-23; 64:23-65:7; 75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, V
67:3-4	AF, FN, L, O, R, FRE 403, MIL, PRIV	63:15-23; 64:23-65:7; 75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, V
67:9-16	AF, FN, L, O, R, FRE 403, MIL, PRIV	63:15-23; 64:23-65:7; 75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15;	R, 403, BSD, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Eubank, Lane			
Date of Deposition: 2021-08-06			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
		77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	
70:6-9	AF, FN, L, O, R, FRE 403, MIL, PRIV	70:10-13; 63:15-23; 64:23-65:7; 75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, V
70:14-17	AF, FN, L, O, R, FRE 403, MIL, PRIV	70:18; 63:15-23; 64:23-65:7; 75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, V
70:19	AF, FN, L, O, R, FRE 403, MIL, PRIV	63:15-23; 64:23-65:7; 75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, V
73:20-21	AF, FN, L, O, R, FRE 403, MIL, PRIV	73:22-74:1; 63:15-23; 64:23-65:7; 75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Eubank, Lane			
Date of Deposition: 2021-08-06			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
74:2-8	AF, FN, L, O, R, FRE 403, MIL, PRIV	74:9-14; 63:15-23; 64:23-65:7; 75:22- 77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, V
74:15-16	AF, FN, L, O, R, FRE 403, MIL, PRIV	63:15-23; 64:23- 65:7; 75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22- 24; 78:2-9; 78:18- 21; 78:23; 78:25- 79:11	R, 403, BSD, V
79:20-22	AF, FN, L, O, R, FRE 403, MIL, PRIV	79:23-80:3; 75:22- 77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, V
80:4-10	AF, FN, L, O, R, FRE 403, MIL, PRIV	80:11-19; 75:22- 77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, V
80:20-81:4	AF, FN, L, O, R, FRE 403, MIL, MIS, ARG	81:5-11; 75:22- 77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Eubank, Lane			
Date of Deposition: 2021-08-06			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
81:12-13	AF, FN, L, O, R, FRE 403, MIL, MIS, ARG	75:22-77:4; 77:7-8; 77:10; 77:12-13; 77:15; 77:17-20; 77:22-24; 78:2-9; 78:18-21; 78:23; 78:25-79:11	R, 403, BSD, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Fesko, John			
Date of Deposition: 2021-08-20			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
7:16-20	PRIVACY		FOW
20:6-11	FRE 801		FOW
20:21-21:10	FRE 801		FOW
72:4-7	SC		
72:10	SC		
94:16-21	FRE 403, FRE 611, MIS, SC		FOW
95:4-17	FRE 403, AF, FN, SC, ID	95:18-19; 95:22-96:1	R, V, 403, OB, BSD, FOW
96:3-15	FRE 403, AF, FN, SC, ID	96:16-18; 96:21-22; 98:21-22; 99:1-5; 99:7; 99:11-12; 99:14-20; 99:23-100:5	R, V, 403, OB, BSD, FOW
100:7-10	FRE 403, SC		FOW
100:13-14	FRE 403, SC		FOW
112:14-18	R, FRE 403, MIL		FOW
112:23-113:12	SC, V, CD, S, R, FRE 403, MIL		FOW
113:15-17	SC, V, CD, S, R, FRE 403, MIL		FOW
113:19-22	SC, V, CD, S, R, FRE 403, MIL		FOW
113:25-114:3	SC, V, CD, S, R, FRE 403, MIL		FOW
114:14-20	FRE 611, SC, V, CD, S, R, FRE 403, MIL		FOW
114:23-25	FRE 611, SC, V, CD, S, R, FRE 403, MIL	115:1-116:11	R, V, 403, BSD, FOW
116:12-13	SC, V, R, FRE 403, MIL		FOW
116:16-20	SC, V, R, FRE 403, MIL		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Fesko, John			
Date of Deposition: 2021-08-20			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
118:15-25	R, FRE 403, SC, S, CD, ARG, MIL		FOW
119:3	R, FRE 403, SC, S, CD, ARG, MIL	119:5-7; 119:12-18	R, V, 403, BSD, FOW
126:3-5	SC, S, V, R, FRE 403, MIL		FOW
126:8-9	SC, S, V, R, FRE 403, MIL		FOW
126:11-13	R, FRE 403, SC, S, MIL		FOW
126:16-19	R, FRE 403, SC, S, MIL		FOW
127:13-14	R, FRE 403, SC, S, MIL		FOW
127:17-20	R, FRE 403, SC, S, MIL		FOW
127:22-23	R, FRE 403, SC, S, ARG, MIL		FOW
128:1-3	R, FRE 403, SC, S, ARG, MIL		FOW
128:5-6	R, FRE 403, SC, S, ARG, MIL		FOW
128:9-10	R, FRE 403, SC, S, ARG, MIL		FOW
132:13-133:2	FRE 403, SC, V, AF, FN, ID	130:17-131:4; 131:7-13	R, V, 403, BSD, FOW
133:5-10	FRE 403, SC, V, AF, FN, ID	130:17-131:4; 131:7-13	R, V, 403, BSD, FOW
134:1-12	SC, S, V, MIS, R, FRE 403, MIL	152:20-153:9; 144:5-8; 144:11	R, V, 403, BSD, FOW
134:15-21	SC, S, V, MIS, R, FRE 403, MIL		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Fesko, John			
Date of Deposition: 2021-08-20			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
134:23-136:3	SC, MIS, V, FRE 611, S, R, FRE 403, MIL	144:5-8; 144:11	R, V, 403, BSD, FOW
136:6	SC, MIS, V, FRE 611, S, R, FRE 403, MIL		FOW
136:8-9	SC, MIS, V, FRE 611, S, R, FRE 403, MIL		FOW
136:13-14	SC, MIS, V, FRE 611, S, R, FRE 403, MIL		FOW
136:16-18	SC, S, V, ARG, R, FRE 403, MIL		FOW
136:21-23	SC, S, V, ARG, R, FRE 403, MIL		FOW
139:6-8	FRE 403, MIS, SC, S, R, MIL		FOW
139:12-14	FRE 403, MIS, SC, S, R, MIL		FOW
139:16-17	FRE 403, MIS, SC, S, ARG, R, MIL		FOW
139:21	FRE 403, MIS, SC, S, ARG, R, MIL		FOW
139:23-24	FRE 403, MIS, SC, S, ARG, R, MIL		FOW
140:3-6	FRE 403, MIS, SC, S, ARG, R, MIL		FOW
140:8-10	FRE 403, SC, S, R, MIL		FOW
140:13	FRE 403, SC, S, R, MIL		FOW
140:15-17	FRE 403, SC, S, R, MIL		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Fesko, John			
Date of Deposition: 2021-08-20			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
140:20-22	FRE 403, SC, S, R, MIL		FOW
141:15-17	FRE 403, SC, S		FOW
141:20-23	FRE 403, SC, S	144:5-8; 144:11	R, V, 403, BSD, FOW
146:23-24	SC, CD, ID	147:17-19	R, V, 403, BSD, FOW
147:2-4	SC, CD, ID	145:12-146:6; 146:8; 146:11-15	R, V, 403, OB, BSD, FOW
147:20-148:8	SC, S		FOW
148:9-11	FRE 403, SC, S		FOW
148:14-16	FRE 403, SC, S		FOW
148:18-149:6	FRE 403, SC, S, V		FOW
149:9-13	FRE 403, SC, S, V		FOW
149:15-17	FRE 403, SC, S, V		FOW
149:21-23	FRE 403, SC, S, V		FOW
149:25-150:1	FRE 403, SC, S, V, MIS, H		FOW
150:5-7	FRE 403, SC, S, V, MIS, H		FOW
150:9-10	FRE 403, SC, S, V, MIS	152:20-153:9	R, V, 403, BSD, FOW
150:14-19	FRE 403, SC, S, V, MIS	152:20-153:9	R, V, 403, BSD, FOW
150:21-151:1	FRE 403, SC, S, V, MIS		FOW
151:5-16	FRE 403, SC, S, V, MIS		FOW
151:18-19	FRE 403, SC, S, V, MIS	151:25-152:5	R, V, 403, OB, BSD, FOW
151:22-23	FRE 403, SC, S, V, MIS	151:25-152:5	R, V, 403, OB, BSD, FOW
158:7-11	FRE 408, SC, S		FOW
158:15-17	FRE 408, SC, S		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Fesko, John			
Date of Deposition: 2021-08-20			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
158:20	FRE 408, SC, S		FOW
158:22-24	FRE 408, SC, ARG, MIL, R, FRE 403		FOW
159:2	FRE 408, SC, ARG, MIL, R, FRE 403		FOW
159:4-5	FRE 408, SC, ARG, MIL, R, FRE 403		FOW
159:8	FRE 408, SC, ARG, MIL, R, FRE 403		FOW
161:8-10	FRE 408, SC, S, AS, FN, O, R, FRE 403		FOW
161:13	FRE 408, SC, S, AS, FN, O, R, FRE 403		FOW
163:7-10	FRE 408, SC, S, MIS		FOW
163:13-15	SC, S, MIS		FOW
163:17-20	SC		FOW
163:23	FRE 408, SC		FOW
195:16-18	O, SC, S, V		FOW
195:21-25	SC, S, O, V		FOW
196:2-4	FRE 408, SC, S, O, V, MIS		FOW
196:7-17	FRE 408, SC, S, O, V, MIS		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Gemelos, George			
Date of Deposition: 2021-08-24			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
5:16-19	PRIVACY		
13:25-14:9	ID	14:10-14:16	R, 403, BSD, FOW, V
17:24-18:7	ARG, FN, ID	18:8-19:22; 20:15-22	R, 403, BSD, FOW, OB, SPEC, V
20:1-2	V, ID, FRE 403, R, MIL	20:15-22; 24:15-26:15; 36:11-23; 37:25-38:23	R, 403, BSD, FOW, OB, SPEC, V
21:1-5	V, O, ID, R, FRE 403, MIL	20:15-22	R, 403, BSD, FOW, V
41:3-18	ARG, C, L/SOL, ID, R, FRE 403, MIL		
41:20	ARG, C, L/SOL, ID, R, FRE 403, MIL		
41:22	ARG, C, L/SOL, ID, R, FRE 403, MIL		
41:24-25	ARG, C, L/SOL, R, FRE 403, MIL		
42:2-8	ARG, C, L/SOL, ID, R, FRE 403, MIL		
42:10-13	ARG, C, L/SOL, R, FRE 403, MIL		
45:3-5	ARG, C, L/SOL, ID, R, FRE 403, MIL		
45:7-20	ARG, C, L/SOL, R, FRE 403, MIL		
53:15-24	ARG, C, L/SOL, OBJ, MIS, R, FRE 403, MIL		FOW
55:9-11	ARG, C, L/SOL, ID, R, FRE 403, MIL		
55:14-15	ARG, C, L/SOL, R, FRE 403, MIL		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Gemelos, George			
Date of Deposition: 2021-08-24			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
58:16-17	V, R, FRE 403, MIL	59:12-60:3	R, 403, BSD, SPEC, V
58:19	V, R, FRE 403, MIL	59:12-60:3	R, 403, BSD, SPEC, V
58:21-59:7	ARG, O, C, ID, R, FRE 403, MIL	59:12-60:3	R, 403, BSD, SPEC, V
59:9-10	ARG, O, C, R, FRE 403, MIL	59:12-60:3	R, 403, BSD, SPEC, V
60:10-11	ARG, O, C, ID, R, FRE 403, MIL	59:12-60:3	R, 403, BSD, SPEC, V
60:13-17	ARG, O, C, R, FRE 403, MIL	59:12-60:3	R, 403, BSD, SPEC, V
60:19-20	ARG, O, C, ID, R, FRE 403, MIL	59:12-60:3	R, 403, BSD, SPEC, V
62:21-63:8	ARG, O, C, ID, R, FRE 403, MIL		FOW
68:11-13	L, V, ID, R, FRE 403, MIL	65:2-5; 66:18-67:1; 78:7-80:15	R, 403, BSD, SPEC, V
68:16-22	L, V, ID, R, FRE 403, MIL	65:2-5; 66:18-67:1; 78:7-80:15	R, 403, BSD, SPEC, V
71:15-16	L, V, R, FRE 403, MIL	65:2-5; 66:18-67:1; 78:7-80:15	R, 403, BSD, SPEC, V
71:19-21	L, V, R, FRE 403, ID, MIL	65:2-5; 66:18-67:1; 78:7-80:15	R, 403, BSD, SPEC, V
71:23-72:2	L, V, R, FRE 403, ID, MIL	65:2-5; 66:18-67:1; 78:7-80:15	R, 403, BSD, SPEC, V
72:4-6	L, V, R, FRE 403, MIL	65:2-5; 66:18-67:1; 78:7-80:15	R, 403, BSD, SPEC, V
73:9-12	ARG, PRIV, C, ID, FRE 403, R, MIL	65:2-5; 66:18-67:1; 73:13-17; 78:7-80:15	R, 403, BSD, SPEC, V
73:18	ARG, PRIV, C, FRE 403, R, MIL	65:2-5; 66:18-67:1; 78:7-80:15	R, 403, BSD, SPEC, V
73:20-21	ARG, PRIV, C, FRE 403, R, MIL	65:2-5; 66:18-67:1; 78:7-80:15	R, 403, BSD, FOW, SPEC, V
76:18-19	L, V, ID, R, FRE 403, MIL	65:2-5; 66:18-67:1; 78:7-80:15	R, 403, BSD, SPEC, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Gemelos, George			
Date of Deposition: 2021-08-24			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
76:22-24	L, V, R, FRE 403, MIL	65:2-5; 66:18-67:1; 78:7-80:15	R, 403, BSD, SPEC, V
84:20-21	L, V, R, FRE 403, MIL	65:2-5; 66:18-67:1; 78:7-80:15	R, 403, BSD, SPEC, V
84:24-85:1	L, C, R, FRE 403, MIL	65:2-5; 66:18-67:1; 78:7-80:15	R, 403, BSD, SPEC, V
86:17-18	L, C, ID, R, FRE 403, MIL	65:2-5; 66:18-67:1; 78:7-80:15	R, 403, BSD, SPEC, V
86:21-23	L, C, R, FRE 403, MIL	65:2-5; 66:18-67:1; 78:7-80:15	R, 403, BSD, SPEC, V
99:15-100:8	ARG, C, L/SOL, R, FRE 403, MIL		
100:10-19	ARG, C, L/SOL, R, FRE 403, MIL		
103:1-23	ARG, C, L/SOL, R, FRE 403, MIL	108:16-109:10	R, 403, BSD, FOW, SPEC, V
107:9-18	ARG, C, L/SOL, R, FRE 403, MIL	108:16-109:10	R, 403, SPEC, V
107:20-108:7	ARG, C, L/SOL, R, FRE 403, MIL	108:16-109:10	R, 403, SPEC, V
108:9-14	ARG, C, L/SOL, R, FRE 403, MIL	108:16-109:10	R, 403, SPEC, V
118:4-7	L, S, R, FRE 403, MIL		
118:10-14	L, S, ID, R, FRE 403, MIL		
127:19-21	R, FRE 403, MIL		FOW
128:20-129:10	L, C, R, FRE 403, MIL		FOW
130:18-131:2	L, C, R, FRE 403, ID, MIL		
131:4	L, C, R, FRE 403, MIL		
131:6	ARG, C, R, FRE 403, ID, MIL		
131:8-12	ARG, C, R, FRE 403, ID, MIL		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Gemelos, George			
Date of Deposition: 2021-08-24			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
131:15-16	ARG, C, R, FRE 403, MIL		
131:18-19	ARG, C, R, FRE 403, ID, MIL		
131:22-23	ARG, C, R, FRE 403, MIL		
131:25-132:1	ARG, C, R, FRE 403, MIL		
132:25-133:8	L, C, ARG, R, FRE 403, ID, PRIV, MIL		
133:11-15	L, C, ARG, R, FRE 403, ID, PRIV, MIL		
133:17-134:4	L, C, ARG, R, FRE 403, ID, PRIV, MIL	136:15-137:1; 139:6-140:13	R, 403, BSD, OB, SPEC, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Hill, Matthew Micah			
Date of Deposition: 2021-08-03			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
8:9-12	PRIVACY	14:13-15:1; 15:7-9	R, V, 403, BSD, FOW
16:8-19	L, AF, FN, FRE 403, R, MIL	15:22-16:7	R, V, 403, BSD, FOW
17:4-5	L, AF, FN, FRE 403, R, MIL	16:20-21; 16:25-17:2; 17:11-12; 17:15-19; 17:22-18:1; 18:6-7; 18:10-11; 18:13-22	R, V, 403, BSD, FOW
17:7-9	L, AF, FN, FRE 403, R, MIL	16:20-21; 16:25-17:2; 17:11-12; 17:15-19; 17:22-18:1; 18:6-7; 18:10-11; 18:13-22	R, V, 403, BSD, FOW
25:19-20	S, V, R, FRE 403		FOW
25:22-24	S, V, R, FRE 403		FOW
33:6-9	ID, BPRL, L		FOW
33:18-34:3	L, ARG, R, FRE 403, MIL	26:14-27:1; 27:16-24; 28:17-24; 35:11-16; 35:18-19; 35:21-22; 35:25-36:1; 36:11-12; 36:15-17; 36:19-20; 36:23-37:3; 37:21-38:2; 57:7-58:5; 73:7-11; 73:13-17; 74:4-5; 74:7-25	R, V, 403, BSD, FOW
34:10-11	L, ARG, R, FRE 403, MIL	26:14-27:1; 27:16-24; 28:17-24; 35:11-16; 35:18-19; 35:21-22; 35:25-36:1; 36:11-12; 36:15-17; 36:19-20; 36:23-37:3; 37:21-38:2; 57:7-58:5; 73:7-11; 73:13-17; 74:4-5; 74:7-25	R, V, 403, BSD, FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Hill, Matthew Micah			
Date of Deposition: 2021-08-03			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
35:3-4	L, ARG, C, R, FRE 403, MIL	26:14-27:1; 27:16-24; 28:17-24; 35:11-16; 35:18-19; 35:21-22; 35:25-36:1; 36:11-12; 36:15-17; 36:19-20; 36:23-37:3; 37:21-38:2; 57:7-58:5; 73:7-11; 73:13-17; 74:4-5; 74:7-25	R, V, 403, BSD, FOW
35:8-9	L, ARG, C, R, FRE 403, MIL	26:14-27:1; 27:16-24; 28:17-24; 35:11-16; 35:18-19; 35:21-22; 35:25-36:1; 36:11-12; 36:15-17; 36:19-20; 36:23-37:3; 37:21-38:2; 57:7-58:5; 73:7-11; 73:13-17; 74:4-5; 74:7-25	R, V, 403, BSD, FOW
71:16-18	L, ARG, R, FRE 403, MIL	26:14-27:1; 27:16-24; 28:17-24; 35:11-16; 35:18-19; 35:21-22; 35:25-36:1; 36:11-12; 36:15-17; 36:19-20; 36:23-37:3; 37:21-38:2; 57:7-58:5; 73:7-11; 73:13-17; 74:4-5; 74:7-25	R, V, 403, BSD, FOW
71:21-23	L, ARG, R, FRE 403, MIL	26:14-27:1; 27:16-24; 28:17-24; 35:11-16; 35:18-19; 35:21-22; 35:25-36:1; 36:11-12; 36:15-17; 36:19-20; 36:23-37:3; 37:21-38:2; 57:7-58:5; 73:7-11; 73:13-17; 74:4-5; 74:7-25	R, V, 403, BSD, FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Hill, Matthew Micah			
Date of Deposition: 2021-08-03			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
71:25-72:3	L, ARG, R, FRE 403, MIL	26:14-27:1; 27:16-24; 28:17-24; 35:11-16; 35:18-19; 35:21-22; 35:25-36:1; 36:11-12; 36:15-17; 36:19-20; 36:23-37:3; 37:21-38:2; 57:7-58:5; 73:7-11; 73:13-17; 74:4-5; 74:7-25	R, V, 403, BSD, FOW
72:6	L, ARG, R, FRE 403, MIL	26:14-27:1; 27:16-24; 28:17-24; 35:11-16; 35:18-19; 35:21-22; 35:25-36:1; 36:11-12; 36:15-17; 36:19-20; 36:23-37:3; 37:21-38:2; 57:7-58:5; 73:7-11; 73:13-17; 74:4-5; 74:7-25	R, V, 403, BSD, FOW
73:19-20	V, L, R, FRE 403, MIL	26:14-27:1; 27:16-24; 28:17-24; 35:11-16; 35:18-19; 35:21-22; 35:25-36:1; 36:11-12; 36:15-17; 36:19-20; 36:23-37:3; 37:21-38:2; 57:7-58:5; 73:7-11; 73:13-17; 74:4-5; 74:7-25	R, V, 403, BSD, FOW
73:23-74:2	V, L, R, FRE 403, MIL	26:14-27:1; 27:16-24; 28:17-24; 35:11-16; 35:18-19; 35:21-22; 35:25-36:1; 36:11-12; 36:15-17; 36:19-20; 36:23-37:3; 37:21-38:2; 57:7-58:5; 73:7-11; 73:13-17; 74:4-5; 74:7-25	R, V, 403, BSD, FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Hill, Matthew Micah			
Date of Deposition: 2021-08-03			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
80:3-6	L, ARG, R, FRE 403, MIL	75:17-18; 75:25-76:3; 76:9-10; 76:12-17; 76:20-24; 77:22-78:1; 78:4-16; 80:13-16; 80:17-18; 80:21-81:3; 82:2-5; 86:1-87:1; 88:6-13; 89:19-90:4; 90:6-10; 90:12-15; 90:17-20	R, V, 403, BSD, FOW, OB
80:9-11	L, ARG, R, FRE 403, MIL	75:17-18; 75:25-76:3; 76:9-10; 76:12-17; 76:20-24; 77:22-78:1; 78:4-16; 80:13-16; 80:17-18; 80:21-81:3; 82:2-5; 86:1-87:1; 88:6-13; 89:19-90:4; 90:6-10; 90:12-15; 90:17-20	R, V, 403, BSD, FOW, OB
80:17-18	L, ARG, R, FRE 403, MIL	75:17-18; 75:25-76:3; 76:9-10; 76:12-17; 76:20-24; 77:22-78:1; 78:4-16; 80:13-16; 80:17-18; 80:21-81:3; 82:2-5; 86:1-87:1; 88:6-13; 89:19-90:4; 90:6-10; 90:12-15; 90:17-20	R, V, 403, BSD, FOW, OB
80:21-81:3	L, ARG, R, FRE 403, MIL	75:17-18; 75:25-76:3; 76:9-10; 76:12-17; 76:20-24; 77:22-78:1; 78:4-16; 80:13-16; 80:17-18; 80:21-81:3; 82:2-5; 86:1-87:1; 88:6-13; 89:19-90:4; 90:6-10; 90:12-15; 90:17-20	R, V, 403, BSD, FOW, OB
98:6-16	L, CD, R, FRE 403, MIL		FOW
99:5-8	MIS, L, R, FRE 403, MIL	101:3-13; 101:16-102:19; 104:3-21	R, V, 403, BSD, FOW
99:12-16	MIS, L, R, FRE 403, MIL	101:3-13; 101:16-102:19; 104:3-21	R, V, 403, BSD, FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Hill, Matthew Micah			
Date of Deposition: 2021-08-03			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
99:18-22	MIS, L, R, FRE 403, MIL	101:3-13; 101:16-102:19; 104:3-21	R, V, 403, BSD, FOW
100:14-17	L, R, FRE 403, MIL	101:3-13; 101:16-102:19; 104:3-21	R, V, 403, BSD, FOW
100:20-101:1	L, R, FRE 403, MIL	101:3-13; 101:16-102:19; 104:3-21	R, V, 403, BSD, FOW
105:4-106:11	S, V, IH, R, FRE 403, MIL	104:3-21; 108:3-19; 108:25-109:21	R, V, 403, BSD, FOW
106:15-20	S, V, IH, R, FRE 403, MIL	104:3-21; 108:3-19; 108:25-109:21	R, V, 403, BSD, FOW
106:22-24	S, AF, IH, O, R, FRE 403, MIL	104:3-21; 108:3-19; 108:25-109:21	R, V, 403, BSD, FOW
107:4-12	S, AF, IH, O, R, FRE 403, MIL	104:3-21; 108:3-19; 108:25-109:21	R, V, 403, BSD, FOW
107:15-108:2	S, R, FRE 403, MIL	104:3-21; 108:3-19; 108:25-109:21	R, V, 403, BSD, FOW
119:2-3	V, ARG, R, FRE 403, MIL	114:11-115:2; 115:5-10; 122:6-13	R, V, 403, BSD, FOW
119:6-18	V, ARG, R, FRE 403, MIL	114:11-115:2; 115:5-10; 122:6-13	R, V, 403, BSD, FOW
119:20-120:2	V, ARG, R, FRE 403, MIL	114:11-115:2; 115:5-10; 122:6-13	R, V, 403, BSD, FOW
120:4-5	L, R, FRE 403, MIL	114:11-115:2; 115:5-10; 122:6-13	R, V, 403, BSD, FOW
120:8-11	L, R, FRE 403, MIL	114:11-115:2; 115:5-10; 122:6-13	R, V, 403, BSD, FOW
120:16-121:1	V, R, FRE 403, MIL	114:11-115:2; 115:5-10; 122:6-13	R, V, 403, BSD, FOW
121:4-7	V, R, FRE 403, MIL	114:11-115:2; 115:5-10; 122:6-13	R, V, 403, BSD, FOW
121:9-122:5	V, R, FRE 403, MIL	114:11-115:2; 115:5-10; 122:6-13	R, V, 403, BSD, FOW
122:14-123:4	AF, FN, R, FRE 403, MIL	114:11-115:2; 115:5-10; 122:6-13	R, V, 403, BSD, FOW
123:7-14	AF, FN, R, FRE 403, MIL	114:11-115:2; 115:5-10; 122:6-13	R, V, 403, BSD, FOW
128:22-129:20	ARG, FRE 403	129:21-131:6; 132:5-7; 132:18-133:1	R, V, 403, BSD, FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Hill, Matthew Micah			
Date of Deposition: 2021-08-03			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
135:22-137:25	V, C, ARG, L/SOL, FRE 403, MIL	134:4-7; 135:3-21; 138:1-9	R, V, 403, BSD, FOW
140:17-19	S, FRE 403, MIL		FOW
140:22-141:8	S, FRE 403, MIL		FOW
146:5-11	V, ID	149:11-13; 149:17-20; 149:22-23; 149:25-150:4; 150:6-8; 150:11-14	R, V, 403, BSD, FOW
160:3-7	OBJ, O, IH, V, ARG, FRE 403		FOW
160:12	OBJ, O, IH, V, ARG, FRE 403		FOW
160:15-161:21	OBJ, O, IH, V, ARG, FRE 403		FOW
161:23-162:13	OBJ, O, IH, V, ARG, FRE 403	162:20-22; 163:1-8	R, V, 403, BSD, FOW
164:5-7	IH, V, FRE 403		FOW
164:10-166:12	IH, V, FRE 403		FOW
166:23-167:3	IH, O, S, FRE 403		FOW
167:7-11	IH, V, FRE 403		FOW
167:13-16	IH, V, FRE 403		FOW
167:20-21	IH, V, FRE 403		FOW
167:23-168:9	IH, V, FRE 403		FOW
168:12-169:1	IH, V, FRE 403		FOW
171:6-8	L, AF, FN, V, FRE 403	172:5-7; 172:10-12	R, V, 403, BSD, FOW
171:12-172:3	L, AF, FN, V, FRE 403	172:5-7; 172:10-12	R, V, 403, BSD, FOW
173:22-175:3	C, R, FRE 403, MIL		FOW
175:6-11	L, R, FRE 403, MIL		FOW
175:13-176:20	O, S, L, R, FRE 403, MIL		FOW
176:24-25	O, S, L, R, FRE 403, MIL		FOW
177:2-9	O, S, L, R, FRE 403, MIL		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Hill, Matthew Micah			
Date of Deposition: 2021-08-03			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
177:13-15	O, S, L, R, FRE 403, MIL		FOW
177:17-178:7	O, S, L, R, FRE 403, MIL		FOW
178:10-12	O, S, L, R, FRE 403, MIL		FOW
178:14-19	ARG, C, O, S, L, R, FRE 403, MIL		FOW
178:21-22	ARG, C, O, S, L, R, FRE 403, MIL		FOW
178:24-179:15	ARG, C, O, S, L, R, FRE 403, MIL		FOW
179:18-24	ARG, C, O, S, L, R, FRE 403, MIL		FOW
180:2-18	ARG, C, O, S, L, R, FRE 403, MIL		FOW
180:21-181:13	ARG, C, O, S, L, R, FRE 403, MIL		FOW
181:19	ARG, C, O, S, L, R, FRE 403, MIL		FOW
181:23-182:11	ARG, C, O, S, L, R, FRE 403, MIL	-	FOW
186:2-189:3	V, L, R, FRE 403, MIL	185:10-186:1	R, V, 403, BSD, FOW
189:6-25	V, L, R, FRE 403, MIL	185:10-186:1	R, V, 403, BSD, FOW
190:3-191:5	V, L, R, FRE 403, MIL	185:10-186:1	R, V, 403, BSD, FOW
210:21-23	L, AF, FN, R, FRE 403, MIL	209:8-12; 209:16-210:8; 207:12-15; 208:5-14; 208:18-22	R, V, 403, BSD, FOW
211:2-3	L, AF, FN, R, FRE 403, MIL	209:8-12; 209:16-210:8; 207:12-15; 208:5-14; 208:18-22	R, V, 403, BSD, FOW
212:16-213:2	ARG, MIS, FRE 403	213:3-6; 213:8-11; 213:13-214:1	R, V, 403, BSD, FOW
214:2-16	V, IH, FRE 403	214:19-21; 214:24-215:19; 215:21-216:10	R, V, 403, BSD, FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Hill, Matthew Micah			
Date of Deposition: 2021-08-03			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
216:11-217:5	V, IH, FRE 403	217:6-218:8	R, V, 403, BSD, FOW
218:4-10	MIS, ARG, FRE 403	218:23-219:4	R, V, 403, BSD, FOW
218:13-219:17	MIS, ARG, FRE 403	219:18-23; 218:4-8	R, V, 403, BSD, FOW
220:9-11	L, R, FRE 403, MIL		FOW
220:14-20	L, R, FRE 403, MIL		FOW
221:13-17	L, R, FRE 403, MIL	221:21-22; 222:7-8; 222:10-19; 222:21-24	R, V, 403, BSD, FOW
224:18-20	L, IH, R, FRE 403, MIL		FOW
224:23-225:17	L, IH, R, FRE 403, MIL	225:18-23	R, V, 403, BSD, FOW
226:10-22	L, IH, R, FRE 403, MIL	227:4-22; 228:5-7; 228:10-15; 230:2-4; 230:7-12; 230:14-17; 230:21-231:1; 231:4-6; 231:9-23	R, V, 403, BSD, FOW
226:25-227:2	L, IH, R, FRE 403, MIL	227:4-22; 228:5-7; 228:10-15; 230:2-4; 230:7-12; 230:14-17; 230:21-231:1; 231:4-6; 231:9-23	R, V, 403, BSD, FOW
232:15-16	L, IH, R, FRE 403, MIL	231:25-232:6; 232:7-8; 232:11-13	R, V, 403, BSD, FOW
232:19-233:11	L, IH, R, FRE 403, MIL	231:25-232:6; 232:7-8; 232:11-13	R, V, 403, BSD, FOW
234:11-235:2	F, V, R, FRE 403, MIL	227:4-22; 228:5-7; 228:10-15; 230:2-4; 230:7-12; 230:14-17; 230:21-231:1; 231:4-6; 231:9-23; 233:13-15; 233:22-25; 234:2-3; 234:6-9	R, V, 403, BSD, FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Hill, Matthew Micah			
Date of Deposition: 2021-08-03			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
237:11-25	L, MIS, ARG, R, FRE 403, MIL	227:4-22; 228:5-7; 228:10-15; 230:2-4; 230:7-12; 230:14-17; 230:21-231:1; 231:4-6; 231:9-23; 233:13-15; 233:22-25; 234:2-3; 234:6-9	R, V, 403, BSD, FOW
238:3-21	L, MIS, ARG, R, FRE 403, MIL	227:4-22; 228:5-7; 228:10-15; 230:2-4; 230:7-12; 230:14-17; 230:21-231:1; 231:4-6; 231:9-23; 233:13-15; 233:22-25; 234:2-3; 234:6-9	R, V, 403, BSD, FOW
239:20-22	L, BRPL, FRE 403, MIL		FOW
239:24-240:20	L, BRPL, FRE 403, MIL	245:9-17	R, V, 403, BSD, FOW
240:23	L, BRPL, FRE 403, MIL	245:9-17	R, V, 403, BSD, FOW
240:25-241:3	PRIV, L, R, FRE 403, MIL	245:9-17	R, V, 403, BSD, FOW
241:10-12	PRIV, L, R, FRE 403, MIL	245:9-17	R, V, 403, BSD, FOW
241:14-18	PRIV, L, R, FRE 403, MIL	245:9-17	R, V, 403, BSD, FOW
241:23-24	PRIV, L, R, FRE 403, MIL	245:9-17	R, V, 403, BSD, FOW
244:16-245:3	AF, FN, ARG, R, FRE 403, MIL	245:9-17	R, V, 403, BSD, FOW
245:6-7	AF, FN, ARG, R, FRE 403, MIL	245:9-17	R, V, 403, BSD, FOW
246:4-18	OBJ, L, R, FRE 403, MIL	245:9-17	R, V, 403, BSD, FOW
246:20-247:3	OBJ, L, AF, F, FN, ARG, MIS, R, FRE 403, MIL	245:9-17	R, V, 403, BSD, FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Hill, Matthew Micah			
Date of Deposition: 2021-08-03			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
247:5-18	OBJ, L, AF, F, FN, ARG, MIS, R, FRE 403, MIL	245:9-17	R, V, 403, BSD, FOW
247:20-24	OBJ, L, AF, F, FN, ARG, MIS, R, FRE 403, MIL	245:9-17	R, V, 403, BSD, FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Kirkizlar, Huseyin Eser			
Date of Deposition: 2021-07-22			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
9:13-16	PRIVACY	9:19-25	R, V, 403, BSD, FOW
11:11-14	FRE 403		FOW
19:8-10	FN, V, R, FRE 403, MIL	18:17; 18:21-19:7	R, V, 403, BSD, FOW
20:19-21:8	FN, V, R, FRE 403, MIL	20:3-18	R, V, 403, BSD, FOW
26:8-13	V, R, FRE 403, MIL		FOW
29:13-15	FN, V, R, FRE 403, MIL		FOW
29:18-25	FN, V, R, FRE 403, MIL	30:12-20; 30:23-31:2; 31:11-32:3	R, V, 403, BSD, FOW
33:19-21	FN, V, R, FRE 403, MIL	30:12-20; 30:23-31:2; 31:11-32:3	R, V, 403, BSD, FOW
33:24-34:1	FN, V, R, FRE 403, MIL	30:12-20; 30:23-31:2; 31:11-32:3	R, V, 403, BSD, FOW
34:3-8	FN, V, R, FRE 403, MIL	30:12-20; 30:23-31:2; 31:11-32:3	R, V, 403, BSD, FOW
34:11-35:7	FN, V, R, FRE 403, MIL	30:12-20; 30:23-31:2; 31:11-32:3	R, V, 403, BSD, FOW
39:15-17	FN, R, FRE 403, MIL	30:12-20; 30:23-31:2; 31:11-32:3	R, V, 403, BSD, FOW
39:20-23	FN, R, FRE 403, MIL	30:12-20; 30:23-31:2; 31:11-32:3	R, V, 403, BSD, FOW
39:25-40:7	FN, R, FRE 403, MIL	30:12-20; 30:23-31:2; 31:11-32:3	R, V, 403, BSD, FOW
40:10-22	FN, R, FRE 403, MIL	30:12-20; 30:23-31:2; 31:11-32:3	R, V, 403, BSD, FOW
40:25-41:4	FN, R, FRE 403, MIL	30:12-20; 30:23-31:2; 31:11-32:3	R, V, 403, BSD, FOW
42:7-9	FN, AF, R, FRE 403, MIL	30:12-20; 30:23-31:2; 31:11-32:3	R, V, 403, BSD, FOW
42:12-21	FN, AF, R, FRE 403, MIL	30:12-20; 30:23-31:2; 31:11-32:3	R, V, 403, BSD, FOW
43:11-15	R, FRE 403, MIL		FOW
43:20-24	R, FRE 403, MIL		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Kirkizlar, Huseyin Eser			
Date of Deposition: 2021-07-22			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
44:11-20	R, FRE 403, MIL		FOW
45:21-22	AF, S, R, FRE 403, MIL	46:4-11	R, V, 403, BSD, FOW, OB
45:24-46:2	AF, S, R, FRE 403, MIL	46:4-11	R, V, 403, BSD, FOW, OB
46:23-25	V, R, FRE 403, MIL	47:11-17	R, V, 403, BSD, FOW, OB
47:2-9	V, R, FRE 403, MIL	47:11-17	R, V, 403, BSD, FOW, OB
47:19-22	V, R, FRE 403, MIL	49:24-50:9	R, V, 403, BSD, FOW
48:12-20	S, FN, R, FRE 403, MIL	49:24-50:9	R, V, 403, BSD, FOW
49:5-6	S, FN, R, FRE 403, MIL	49:24-50:9	R, V, 403, BSD, FOW
49:9-17	S, FN, R, FRE 403, MIL	49:24-50:9	R, V, 403, BSD, FOW
49:19-23	S, FN, R, FRE 403, MIL	49:24-50:9	R, V, 403, BSD, FOW
50:21-25	S, FN, R, FRE 403, MIL	53:2-23; 56:17-21; 56:23-57:3; 59:11-19	R, V, 403, BSD, FOW, OB
51:3-4	S, FN, ARG, R, FRE 403, MIL	53:2-23; 56:17-21; 56:23-57:3; 59:11-19	R, V, 403, BSD, FOW, OB
51:7-8	S, FN, ARG, R, FRE 403, MIL	53:2-23; 56:17-21; 56:23-57:3; 59:11-19	R, V, 403, BSD, FOW, OB
51:11-15	S, FN, ARG, R, FRE 403, MIL	53:2-23; 56:17-21; 56:23-57:3; 59:11-19	R, V, 403, BSD, FOW, OB
51:17-19	V, R, FRE 403, MIL	53:2-23; 56:17-21; 56:23-57:3; 59:11-19	R, V, 403, BSD, FOW, OB
51:21-25	V, R, FRE 403, MIL	53:2-23; 56:17-21; 56:23-57:3; 59:11-19	R, V, 403, BSD, FOW, OB
53:25-54:1	FN, V, R, FRE 403, MIL	53:2-23; 56:17-21; 56:23-57:3; 59:11-19	R, V, 403, BSD, FOW, OB
54:4-13	FN, V, R, FRE 403, MIL	53:2-23; 56:17-21; 56:23-57:3; 59:11-19; 60:14-21	R, V, 403, BSD, FOW, OB

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Kirkizlar, Huseyin Eser			
Date of Deposition: 2021-07-22			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
54:15-16	FN, V, R, FRE 403, MIL	53:2-23; 56:17-21; 56:23-57:3; 59:11-19; 60:14-21	R, V, 403, BSD, FOW, OB
54:18-19	FN, V, R, FRE 403, MIL	53:2-23; 56:17-21; 56:23-57:3; 59:11-19; 60:14-21	R, V, 403, BSD, FOW, OB
54:21-55:25	MIS, CD, R, FRE 403, MIL	53:2-23; 56:17-21; 56:23-57:3; 59:11-19; 60:14-21	R, V, 403, BSD, FOW, OB
59:21-24	V, MIS, R, FRE 403, MIL	53:2-23; 56:17-21; 56:23-57:3; 59:11-19; 60:14-21	R, V, 403, BSD, FOW, OB
60:2-6	V, S, R, FRE 403, MIL	53:2-23; 56:17-21; 56:23-57:3; 59:11-19; 60:14-21	R, V, 403, BSD, FOW, OB
60:8-11	V, S, R, FRE 403, MIL	53:2-23; 56:17-21; 56:23-57:3; 59:11-19; 60:14-21	R, V, 403, BSD, FOW, OB
69:19-21	R, FRE 403, MIL, FN, AF		FOW
70:10-14	R, FRE 403, MIL, FN, AF		FOW
70:17-21	R, FRE 403, MIL, FN, AF		FOW
74:1-9	R, FRE 403, MIL, FN, AF		FOW
75:6-17	R, FRE 403, MIL, FN, AF	76:14-22	R, V, 403, BSD, FOW, OB
76:10-13	L, R, FRE 403, MIL, FN, AF	76:14-22	R, V, 403, BSD, FOW, OB
76:24-77:1	L, R, FRE 403, MIL, FN, AF	76:14-22	R, V, 403, BSD, FOW, OB
77:4-11	L, R, FRE 403, MIL, FN, AF	76:14-22	R, V, 403, BSD, FOW, OB
77:22-24	L, R, FRE 403, MIL		FOW
79:16-80:4	L, R, FRE 403, MIL		FOW
80:15-18	L, R, FRE 403, MIL		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Kirkizlar, Huseyin Eser			
Date of Deposition: 2021-07-22			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
83:5-11	L, ARG, OBJ, R, FRE 403, MIL	88:23-89:16	R, V, 403, BSD, FOW, OB
83:14-84:2	L, ARG, R, FRE 403, MIL	88:23-89:16	R, V, 403, BSD, FOW, OB
87:11-12	ARG, C, R, FRE 403, MIL	88:23-89:16	R, V, 403, BSD, FOW, OB
87:15-24	MIS, L, R, FRE 403, MIL	88:23-89:16	R, V, 403, BSD, FOW, OB
88:2-10	MIS, L, R, FRE 403, MIL	88:23-89:16	R, V, 403, BSD, FOW, OB
88:13-21	MIS, L, R, FRE 403, MIL	88:23-89:16	R, V, 403, BSD, FOW, OB
89:18-21	MIS, FN, S, L, R, FRE 403, MIL	88:23-89:16	R, V, 403, BSD, FOW, OB
89:25-90:3	MIS, FN, S, L, R, FRE 403, MIL	88:23-89:16	R, V, 403, BSD, FOW, OB
90:7-9	R, FRE 403, AF, FN, L	90:12-15	R, V, 403, BSD, FOW
91:4-20	R, FRE 403, AF, FN, L		FOW
91:23-92:7	R, FRE 403, AF, FN, L		FOW
92:9-11	R, FRE 403, MIL		FOW
92:19-20	R, FRE 403, MIL		FOW
92:23-24	R, FRE 403, MIL		FOW
93:8-17	FN, L, R, FRE 403, MIL		FOW
93:20-23	FN, L, R, FRE 403, MIL		FOW
93:25-94:3	FN, L, R, FRE 403, MIL		FOW
94:6-10	FN, L, R, FRE 403, MIL		FOW
94:14-16	L, R, FRE 403, MIL	94:20-23	R, V, 403, BSD, FOW
95:7-96:2	L, ARG, R, FRE 403, MIL		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Kirkizlar, Huseyin Eser			
Date of Deposition: 2021-07-22			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
96:6-11	L, ARG, R, FRE 403, MIL		FOW
96:16-21	L, R, FRE 403, MIL		FOW
96:25-97:3	L, ARG, R, FRE 403, MIL		FOW
97:14-25	L, ARG, R, FRE 403, MIL		FOW
98:1-3	L, ARG, R, FRE 403, MIL		FOW
98:7-18	L, ARG, R, FRE 403, MIL		FOW
98:21-99:2	L, ARG, R, FRE 403, MIL		FOW
99:4-6	L, R, FRE 403, MIL		FOW
99:18-100:8	L, ARG, R, FRE 403, MIL	100:9-12	R, V, 403, BSD, FOW
100:13-101:3	L, ARG, R, FRE 403, MIL		FOW
101:7-13	L, ARG, R, FRE 403, MIL	101:19-24	R, V, 403, BSD, FOW
101:16-17	L, ARG, R, FRE 403, MIL	101:19-24	R, V, 403, BSD, FOW
102:12-14	L, ARG, R, FRE 403, MIL	102:15-17; 101:19-24	R, V, 403, BSD, FOW, OB
102:18-21	L, ARG, R, FRE 403, MIL	102:15-17; 101:19-24	R, V, 403, BSD, FOW, OB
102:25	L, ARG, R, FRE 403, MIL	102:22-24; 101:19-24	R, V, 403, BSD, FOW, OB
103:2-3	L, ARG, R, FRE 403, MIL	103:4-6; 101:19-24	R, V, 403, BSD, FOW, OB
103:7	L, ARG, R, FRE 403, MIL	103:4-6; 101:19-24	R, V, 403, BSD, FOW, OB
103:9-10	L, ARG, R, FRE 403, MIL	103:11-14; 101:9-14	R, V, 403, BSD, FOW, OB
103:15-22	L, ARG, R, FRE 403, MIL	103:11-14; 101:9-14	R, V, 403, BSD, FOW, OB
103:25-104:2	L, R, FRE 403, MIL		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Kirkizlar, Huseyin Eser			
Date of Deposition: 2021-07-22			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
104:7-11	L, R, FRE 403, MIL	104:12-19	R, V, 403, BSD, FOW
104:20-24	L, ARG, R, FRE 403, MIL	104:25-105:3; 104:12-19	R, V, 403, BSD, FOW, OB
105:4-6	L, ARG, R, FRE 403, MIL	104:25-105:3; 104:12-19	R, V, 403, BSD, FOW, OB
105:8-10	L, R, FRE 403, MIL	105:18-25	R, V, 403, BSD, FOW
106:1-7	L, ARG, R, FRE 403, MIL	106:8-11	R, V, 403, BSD, FOW, OB
106:12-14	L, ARG, R, FRE 403, MIL	106:8-11	R, V, 403, BSD, FOW, OB
107:25-108:5	R. FRE 403, MIL, AF, FN	108:7-19; 109:5-14; 109:16-25	R, V, 403, BSD, FOW, OB
108:20-23	R. FRE 403, MIL, AF, FN	108:7-19; 109:5-14; 109:16-25	R, V, 403, BSD, FOW, OB

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Lacroute, Philippe			
Date of Deposition: 2021-08-17			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
8:19-22	PRIVACY		
20:14-15	FRE 801, ID, V, R, FRE 403, MIL	13:7-15:08	OB, BSD, R, 403
20:17-18	FRE 801, ID, V, R, FRE 403, MIL	13:7-15:08	FOW, OB, BSD, R, 403
20:21-21:11	FRE 801, ID, V, R, FRE 403, MIL	13:7-15:08	FOW, OB, BSD, R, 403
30:17-20	BRPL, L		FOW
31:5-7	BRPL, L		FOW
31:11-12	R, FRE 403, L, V		
31:15-16	R, FRE 403, L, V		
39:25-40:4	BRPL, L, ID, R, FRE 403, MIL		FOW
41:14-17	R, L, V, CD, R, FRE 403, MIL		
41:20-22	R, L, V, CD, R, FRE 403, MIL		
82:6-83:18	R, FRE 403, L, S, V, MIL	81:6-8; 81:13-82:5	FOW, BSD, 403
89:6-13	L, S, V, R, FRE 403, MIL	89:19-23	OB, 403
89:16-17	L, S, V, R, FRE 403, MIL	89:19-23	OB, 403
93:14-19	L, S, V, R, FRE 403, MIL	93:1-5	FOW
93:23-94:5	L, S, V, R, FRE 403, MIL		
94:24-25	L, V, R, FRE 403, MIL		
95:3-6	L, V, R, FRE 403, MIL		
95:8-24	ID, V, R, FRE 403, MIL		FOW
97:3-5	CD, V, L, R, FRE 403, MIL		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Lacroute, Philippe			
Date of Deposition: 2021-08-17			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
97:8-13	CD, V, L, R, FRE 403, MIL		
97:15-23	CD, V, L, R, FRE 403, MIL		FOW
98:1-4	CD, V, L, R, FRE 403, MIL		
98:6-25	CD, V, L, R, FRE 403, MIL		FOW
102:15-17	FRE 403, S	101:9-13; 101:16-17; 105:21-25	403, R, BSD
102:20-21	FRE 403, S	101:9-13; 101:16-17; 105:21-25	403, R, BSD
102:23-24	FRE 403, S	101:9-13; 101:16-17; 105:21-25	403, R, BSD
103:2-4	FRE 403, S	101:9-13; 101:16-17; 105:21-25	403, R, BSD
103:6-7	FRE 403, FRE 611, S, R, MIL	101:9-13; 101:16-17; 105:21-25	403, R, BSD
103:10-12	FRE 403, FRE 611, S, R, MIL	101:9-13; 101:16-17; 105:21-25	403, R, BSD
103:23-25	V, FRE 611, R, FRE 403, MIL	101:9-13; 101:16-17; 105:21-25	403, R, BSD
104:3-5	V, FRE 611, R, FRE 403, MIL	101:9-13; 101:16-17; 105:21-25	403, R, BSD
106:1-6	MIS, S, FRE 611, V, R, FRE 403	105:21-25	403, R
106:9-12	MIS, S, FRE 611, V, R, FRE 403	105:21-25	403, R
106:14-15	S, FRE 611, V, R, FRE 403	105:21-25	403, R
106:18-19	S, FRE 611, V, R, FRE 403	105:21-25	403, R
109:11-19	ID, V, S, AF, O, R, FRE 403, MIL	108:9-21; 108:24-25	FOW, 403, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Lacroute, Philippe			
Date of Deposition: 2021-08-17			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
109:23-110:5	ID, V, S, AF, O, R, FRE 403, MIL	108:9-21; 108:24-25	403, V
110:7-8	ID, V, S, AF, L, R, FRE 403, MIL	108:9-21; 108:24-25	403, V
110:12-14	ID, V, S, AF, L, R, FRE 403, MIL	108:9-21; 108:24-25	403, V
110:17-24	ID, V, S, AF, L, R, FRE 403, MIL	108:9-21; 108:24-25	FOW, 403, V
111:4-7	ID, V, S, AF, L, R, FRE 403, MIL	108:9-21; 108:24-25	403, V
111:21-112:12	ID, R, FRE 403	112:23-113:8	FOW, 403, V
115:21-25	CD, V, L, AF, FN, R, FRE 403, MIL	117:16-18; 117:21-24	403, SPEC
116:3-13	CD, V, L, AF, FN, R, FRE 403, MIL	117:16-18; 117:21-24	403, SPEC
116:15	CD, V, L, AF, FN, R, FRE 403, MIL	117:16-18; 117:21-24	403, SPEC
116:17-117:1	CD, V, L, AF, FN, R, FRE 403, MIL	117:16-18; 117:21-24	403, SPEC
117:4-6	CD, V, L, AF, FN, R, FRE 403, MIL	117:16-18; 117:21-24	403, SPEC
117:8-9	V, S, R, FRE 403, MIL	117:16-18; 117:21-24	403, SPEC
117:12-14	V, S, R, FRE 403, MIL	117:16-18; 117:21-24	403, SPEC
119:6-120:2	AF, F, L, IE, S, FRE 611, O, R, FRE 403	118:20-119:5	FOW
120:5-10	AF, F, L, IE, S, FRE 611, R, FRE 403	118:20-119:5	
120:14-20	AF, F, L, IE, FRE 611, O, V, R, FRE 403		
120:22-121:1	AF, F, L, IE, S, FRE 611, O, V, R, FRE 403	123:19-21; 123:24-124:11	BSD, R, 403
121:5-23	FN, L, IE, S, O, R, FRE 403		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Lacroute, Philippe			
Date of Deposition: 2021-08-17			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
122:1-7	FN, L, IE, S, O, R, FRE 403		FOW
139:3-4	FRE 403, L, S, F, ARG, R, MIL	142:15-22; 143:1-6	BSD, R, 403
139:9-15	FRE 403, L, S, F, ARG, R, MIL	142:15-22; 143:1-6	BSD, R, 403
139:17	L, S, IH, O, V, R, FRE 403, MIL		
139:20-23	L, S, IH, O, V, R, FRE 403, MIL		
139:25-140:2	FRE 403, L, S, F, ARG, R, MIL	141:2-3; 141:6-21	BSD, R, 403, PK
140:5-12	FRE 403, L, S, F, ARG, R, MIL	141:2-3; 141:6-21	BSD, R, 403, PK
140:14-19	V, L, R, FRE 403, MIL		
140:22-25	V, L, R, FRE 403, MIL		
142:15-22	MIS, L, F, R, FRE 403, MIL	142:2-6; 142:10-11	BSD, R, 403
143:1-6	MIS, L, F, R, FRE 403, MIL	142:2-6; 142:10-11	BSD, R, 403
143:8-9	L, F, R, FRE 403, MIL		
143:12-13	L, F, R, FRE 403, MIL		
145:13-19	L, S, FN, O, IH, R, FRE 403, MIL	143:16-20; 144:1-3; 144:6-8	BSD, R, 403
145:22-146:4	L, S, FN, O, IH, R, FRE 403, MIL	143:16-20; 144:1-3; 144:6-8; 146:14-16; 146:19-23	BSD, R, 403
151:14-17	L, S, FN, O, FRE 403	151:2-13	FOW, BSD, R, 403
161:13-18	R, FRE 403, L, MIL		
161:21-25	R, FRE 403, L, MIL		
162:6-24	V, IH, R, FRE 403, MIL		FOW
163:2-8	L, R, FRE 403, MIL		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Lacroute, Philippe			
Date of Deposition: 2021-08-17			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
163:11-13	L, R, FRE 403, MIL		
163:15-22	L, R, FRE 403, MIL		FOW
163:25-164:1	L, R, FRE 403, MIL		
164:3-6	FRE 403, L, S, F, ARG		
164:9-14	FRE 403, L, S, F, ARG		
164:16-22	FRE 403, L, R, MIL		FOW
164:25-165:2	FRE 403, L, R, MIL		
165:4-15	FRE 403, L, R, MIL		FOW
165:18-20	FRE 403, L, R, MIL		
165:22-24	FRE 403, L, R, MIL		
166:2-4	FRE 403, L, R, MIL		
166:6	FRE 403, L, V, R, MIL		
166:9-12	FRE 403, L, V, R, MIL		
166:14-15	FRE 403, L, V, R, MIL		
166:19-20	FRE 403, L, V, R, MIL	168:10; 168:13-19; 168:21-23; 169:2-5	BSD, R, 403
166:22-23	FRE 403, L, V, R, MIL	168:10; 168:13-19; 168:21-23; 169:2-5	BSD, R, 403
167:2-3	FRE 403, L, V, R, MIL	168:10; 168:13-19; 168:21-23; 169:2-5	BSD, R, 403
167:5-6	MIS, FRE 403, L, V, R, MIL		
167:10-13	MIS, FRE 403, L, V, R, MIL		
167:15-20	FRE 403, L, V, R, MIL		
167:24-25	FRE 403, L, V, R, MIL		
168:2-3	V, IH, L, R, FRE 403, MIL	168:10; 168:13-19; 168:21-23; 169:2-5	BSD, R, 403

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Lacroute, Philippe			
Date of Deposition: 2021-08-17			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
168:6-8	V, IH, L, R, FRE 403, MIL	168:10; 168:13-19; 168:21-23; 169:2-5	BSD, R, 403

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Moshkevich, Solomon			
Date of Deposition: 2021-08-27			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
9:20-24	PRIVACY		
18:9-12			
23:19-23	V, R, FRE 403, MIL		FOW
24:1-10	V, R, FRE 403, MIL		FOW
25:1-2	AF, FN		
25:5	AF, FN		
29:21-23	FRE 801		FOW
30:1-6	FRE 801		FOW
33:14-23	R		FOW
34:9-12	V, R		FOW
35:8-11	FRE 403, V, S, R		
35:15-16	FRE 403, V, S, R		
36:4-9	V, R		
36:12-13	V, R		
36:15	V, R		
36:21-25	V, S, R	39:3-4; 39:6-18	R, 403, BSD, SPEC, V
47:25-48:3	R		FOW
48:17-19	MIS, V, S, R		
48:22-24	MIS, V, S, R		
49:1-4	R		FOW
49:22-24	V, R		
50:2-3	V, R		
50:5-8	R		FOW
50:20-23	V, R		
51:1-2	V, R		
51:5-8	R		FOW
56:2-6	R		FOW
63:10-13	V, S, R		
63:16-20	ID, V, S, R	62:7-63:9; 63:21-64:2	R, 403, BSD, SPEC, V
105:3-4	V, AF, ID, R, S	104:4-22	R, 403, BSD, I, SPEC, V
105:7	V, AF, ID, R, S		
123:18-20	V, S		
123:22-124:6	V, S, ID		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Moshkevich, Solomon			
Date of Deposition: 2021-08-27			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
124:8-12	V, S, ID		
124:14-125:9	V, S	131:9-15; 131:17-132:6	R, 403, BSD, FOW, SPEC, V
125:24-126:1			FOW
126:7-18	FRE 403, V, S, R	131:9-15; 131:17-132:6	R, 403, BSD, FOW, SPEC, V
130:4-11	FRE 403, V, ID, R	131:9-15; 131:17-132:6	R, 403, BSD, FOW, SPEC, V
159:5-8	FRE 403, V, ID, R, CD	160:17-21	R, 403, BSD, FOW, NR, SPEC, V
159:12-17	FRE 403, V, ID, R	160:17-21	R, 403, BSD, FOW, NR, SPEC, V
176:7-10	FRE 403, S, SC, L, ARG, R, MIL		FOW
176:13-16	FRE 403, S, SC, L, ARG, R, MIL		FOW
177:6-10	SC, S, FRE 403, R, MIL		FOW
194:5-8	SC, S, L CD, V, MIL, R, FRE 403		
194:17-23	SC, S, L CD, V, MIL, R, FRE 403		
204:17-21	FRE 403, S, SC, L, R		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Rabinowitz, Matthew			
Date of Deposition: 2021-09-02			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
8:9-13	PRIVACY	15:1-15; 15:21-17:5	BSD, FOW, R, 403, I, LW
13:5-9			
24:13-25:11	S, FN, ID	25:12-29:17; 30:19-31:18; 37:8-39:11; 45:25-46:6; 47:4-48:9; 48:23-49:17; 49:20-50:4	FOW, BSD, R, 403, NR, LW
69:20-24	AF, LN, ARG, ID, R, FRE 403, MIL	70:8-23	BSD, NR, R, 403, LW
70:2-6	AF, LN, ARG, ID, R, FRE 403, MIL	70:8-23	BSD, NR, R, 403, LW
109:16-20	AF, FN, ARG, C, R, FRE 403, MIL	110:16-111:13	BSD, R, 403, NR, LW
109:24-110:14	AF, FN, ARG, C, R, FRE 403, MIL	110:16-111:13	BSD, R, 403, NR, LW
111:15-112:1	L, V, R, FRE 403		FOW
112:3-7	L, V		FOW
113:5-7	S, L, R, FRE 403, ID		
113:10-16	S, L, R, FRE 403		
124:3-8	L, V, AF, R, FRE 403, ID	126:25-127:18	FOW, BSD, R, 403, NR, LW
152:3-6	AF, DEP, R, FRE 403	153:22-154:8	BSD, R, 403, NR, LW
152:12-22	AF, DEP, R, FRE 403	153:22-154:8	BSD, R, 403, NR, LW
152:24-154:21	S, ID, R, FRE 403	153:22-154:8	FOW, BSD, R, 403, NR, LW
155:8-11	V, O, IH, FRE 403		
155:15-156:11	V, O, IH, FRE 403		
159:21-23	IH, V, L/SOL, R, FRE 403, MIL		
160:1-3	IH, V, L/SOL, R, FRE 403, MIL		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Rabinowitz, Matthew			
Date of Deposition: 2021-09-02			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
160:7-16	IH, V, L/SOL, R, FRE 403, MIL		FOW
160:25-162:16	S, O, ID, AF, FN, R, FRE 403, MIL		FOW
162:19-24	S, O, ID, AF, FN, R, FRE 403, MIL		FOW
163:3-5	S, O, ID, AF, FN, R, FRE 403, MIL		
164:1-3	C, L/SOL, AF, FN, R, FRE 403		
164:5	C, L/SOL, AF, FN, R, FRE 403		
164:19-165:10	O, L/SOL, AF, FN, R, FRE 403		FOW
171:11-16	IH, O, S, R, FRE, 403, MIL	173:13-174:12	R, 403, LW
171:19-20	IH, O, S, R, FRE, 403, MIL	173:13-174:12	R, 403, LW
171:25-172:5	IH, O, S, V, ID, R, FRE, 403, MIL	173:13-174:12	R, 403, LW
172:9-16	IH, O, S, V, ID, R, FRE, 403, MIL	173:13-174:12	R, 403, LW
176:8-11	L, BRPL		FOW
176:14	L, BRPL		FOW
177:19-178:5	L, OBJ, R, FRE 403		
178:7-10	L, R, FRE 403		
178:13-15	L, R, FRE 403		
179:13-16	L, R, FRE 403		
179:19-22	L, R, FRE 403		
181:11-14	L, O, FRE 403		
181:17-19	L, O, FRE 403		
182:5-7	L, ID, FRE 403		
182:9-24	L, O, FRE 403		
183:1-14	L, O, FRE 403		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Rabinowitz, Matthew			
Date of Deposition: 2021-09-02			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
188:22-189:13	L, O, R, FRE 403, MIL		FOW
189:16-190:1	L, O, R, FRE 403, MIL		
195:9-18	S, IH, O, ID, FRE 403		
195:22-196:2	S, IH, O, FRE 403		
196:3-18	S, IH, O, ID, FRE 403		FOW
196:21-197:3	S, IH, O, L/SOL, FRE 403		
197:5-199:12	S, IH, O, L/SOL, FRE 403		FOW
215:3-6	L, R, FRE 403, ID		
215:9-13	L, R, FRE 403		
215:17-18	L, BRPL, AF, FN, R, FRE 403		
216:7-218:22	V, ARG, C, R, FRE 403, AF, FN	226:6-24; 235:6-20; 235:22-236:10; 247:3-20; 248:8-20; 249:25-251:2; 251:4-252:9	FOW, BSD, R, 403, NR, O, LW
218:25-219:1	S, R, FRE 403, ARG, AF, FN		
219:5-11	S, R, FRE 403, ARG, AF, FN		
238:1-6	R, FRE 403, MIL		FOW
238:11	R, FRE 403, MIL		FOW
239:6-240:1	OBJ, R, FRE 403, PRIV, MIL		
253:2-5	AF, FN, R, FRE 403		FOW
253:9	AF, FN, R, FRE 403		FOW
253:20-254:10	L, S, FRE 403		FOW
254:13-20	L, S, FRE 403		
254:22-23	S, FRE 403		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Rabinowitz, Matthew			
Date of Deposition: 2021-09-02			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
255:1-6	S, FRE 403		
255:8-11	L, S, R, FRE 403		
255:14-17	L, S, R, FRE 403		
255:19-256:3	L, R, FRE 403		FOW
283:1-6	PRIV, FN, ARG, R, FRE 403, MIL		
283:9-19	AF, FN, ARG, R, FRE 403, MIL		
283:23-24	AF, FN, ARG, R, FRE 403, MIL		
284:2-24	AF, FN, ARG, MIL	287:15-288:24	FOW, BSD, R, 403, NR, LW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Rabinowitz, Matthew			
Date of Deposition: 2021-12-07			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
307:4-8	PRIVACY		
307:22-25	BPRL		FOW
308:2	BPRL	313:7-23; 336:12-16	FOW, BSD, R, 403, LW
308:4-21	R, FRE 403	313:7-23; 336:12-16	FOW, BSD, R, 403, LW
321:1-2	PRIV, V, R, FRE 403, ID, MIL	321:3-10	OB, R, 403, LW
321:11-19	PRIV, V, R, FRE 403, MIL	321:3-10	OB, R, 403, LW
322:4-8	PRIV, V, R, FRE 403, MIL		
322:22-323:11	PRIV, V, R, FRE 403, ID, MIL		
323:13-18	PRIV, V, R, FRE 403, MIL		FOW
330:3-332:14	SC, MIL, R, FRE 403, MIL		FOW
333:20-334:13	FN, AF, S, R, FRE 403, MIL		FOW
335:18-336:11	ID	336:12-16	FOW, OB, 403, LW
350:14-19	AF, FN, MIS, ID, R, FRE 403, MIL		
350:24-351:4	AF, FN, MIS, R, FRE 403, MIL		
351:6-20	AF, FN, MIS, ID, R, FRE 403, MIL	352:3-10; 361:10-362:1; 362:3; 362:5-10; 432:16-433:14; 433:15-21; 433:23-434:12; 435:5-17; 437:15-438:8	FOW, BSD, R, 403, NR, MIS, LW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Rabinowitz, Matthew			
Date of Deposition: 2021-12-07			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
351:23-352:2	AF, FN, MIS, ID, R, FRE 403, MIL	352:3-10; 361:10-362:1; 362:3; 362:5-10; 432:16-433:14; 433:15-21; 433:23-434:12; 435:5-17; 437:15-438:8	FOW, BSD, R, 403, NR, MIS, LW
362:21-363:2	R, FRE 403, MIL		FOW
371:22-373:9	SC, MIS, ARG, R, FRE 403, ID, MIL	370:21-371:20	FOW, BSD, R, 403, NR, LW
373:14-25	SC, MIS, ARG, R, FRE 403, MIL		
374:14-19	SC, MIL, R, FRE 403, MIL		FOW
377:18-21	SC, ARG, C, R, FRE 403, MIL	381:10-23	R, 403, LW
377:23-379:19	SC, ARG, C, R, FRE 403, MIL	381:10-23	FOW, R, 403, V, LW
381:25-382:6	ID, S, MIS, SC, R, FRE 403, MIL	381:10-23	FOW, R, 403, V, LW
382:10-14	S, MIS, SC, R, 403, MIL	381:10-23	FOW, R, 403, V, LW
382:16-384:3	S, MIS, SC, R, 403, MIL	381:10-23	FOW, R, 403, V, LW
385:24-386:9	V, S, R, FRE 403, MIL		FOW
386:16-21	V, S, R, FRE 403, MIL		FOW
387:3-15	V, S, R, FRE 403, MIL		
390:1-12	ARG, C, R, FRE 403, MIL		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Rabinowitz, Matthew			
Date of Deposition: 2021-12-07			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
392:2-5	AF, V, R, FRE 403, MIL	430:16-24; 431:2-9; 432:16-434:12; 435:5-17; 436:13-21; 437:9-10; 437:15-438:8	BSD, R, 403, NR, O, V, LW
392:8-9	AF, V, R, FRE 403, MIL	430:16-24; 431:2-9; 432:16-434:12; 435:5-17; 436:13-21; 437:9-10; 437:15-438:8	BSD, R, 403, NR, O, V, LW
392:11-12	V, AF, FN, R, FRE 403, MIL	430:16-24; 431:2-9; 432:16-434:12; 435:5-17; 436:13-21; 437:9-10; 437:15-438:8	BSD, R, 403, NR, O, V, LW
392:15-393:4	V, AF, FN, R, FRE 403, MIL	430:16-24; 431:2-9; 432:16-434:12; 435:5-17; 436:13-21; 437:9-10; 437:15-438:8	BSD, R, 403, NR, O, V, LW
401:1-5	MIS, ARG, SC, R, FRE 403, MIL		
401:8-22	MIS, ARG, SC, R, FRE 403, MIL		
401:24-402:18	MIS, AF, FN, R, FRE 403, MIL		FOW
402:22-23	MIS, AF, FN, R, FRE 403, MIL		
402:25-403:1	S, PRIV, SC, R, FRE 403, MIL		
403:5-19	S, PRIV, SC, R, FRE 403, MIL		
403:21-23	ARG, SC, C, R, FRE 403, MIL		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Rabinowitz, Matthew			
Date of Deposition: 2021-12-07			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
404:1-24	ARG, SC, C, R, FRE 403, MIL	405:11-406:8	BSD, R, 403, NR, V, LW
408:4-5	ARG, C, SC, PRIV, ID, MIL	405:11-406:8	BSD, R, 403, NR, V, LW
408:8-9	ARG, C, SC, PRIV, R, FRE 403, MIL	405:11-406:8	BSD, R, 403, NR, V, LW
408:13-409:19	ARG, C, SC, PRIV, R, FRE 403, MIL	405:11-406:8	BSD, R, 403, NR, V, LW
427:2-11	CD, AF, FN, R, FRE 403, MIL	430:16-24; 431:2-9; 432:16-434:12; 435:5-17; 436:13-21; 437:9-10; 437:15-438:8	BSD, R, 403, NR, V, LW
427:13	CD, AF, FN, R, FRE 403, MIL	430:16-24; 431:2-9; 432:16-434:12; 435:5-17; 436:13-21; 437:9-10; 437:15-438:8	BSD, R, 403, NR, V, LW
427:18-21	CD, AF, FN, R, FRE 403, MIL	430:16-24; 431:2-9; 432:16-434:12; 435:5-17; 436:13-21; 437:9-10; 437:15-438:8	BSD, R, 403, NR, V, LW
428:2-3	CD, AF, FN, R, FRE 403, MIL	430:16-24; 431:2-9; 432:16-434:12; 435:5-17; 436:13-21; 437:9-10; 437:15-438:8	BSD, R, 403, NR, V, LW
428:5-8	CD, AF, FN, R, FRE 403, MIL	430:16-24; 431:2-9; 432:16-434:12; 435:5-17; 436:13-21; 437:9-10; 437:15-438:8	BSD, R, 403, NR, V, LW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Rabinowitz, Matthew			
Date of Deposition: 2021-12-07			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
428:15-429:4	CD, AF, FN, ID, R, FRE 403, ID, MIL	429:6-10; 430:16-24; 431:2-9; 432:16-434:12; 435:5-17; 436:13-21; 437:9-10; 437:15-438:8	BSD, R, 403, NR, V, LW
439:21-22	BRPL, L		
440:5-8	R, FRE 403, MIL		FOW
440:10-22	MIS V, R, FRE 403, MIL		FOW
440:25-441:4	MIS V, R, FRE 403, MIL		
441:6-13	MIS V, R, FRE 403, MIL		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-LPS)			
Witness: Ryan, Allison			
Date of Deposition: 2021-08-13			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
11:17-21	PRIVACY	11:22-25	
15:11-17	ID	16:24-17:11	R, 403, BSD, OB, V
16:13-15	ID	17:20-18:5	R, 403, BSD, OB, V
18:7-15	ID	18:16-19:8; 19:16-20:12; 20:22-21:6; 21:8-15; 22:9-13; 23:9-19; 23:22-24:13; 24:15-25:12; 25:14-26:5; 26:16-27:8	R, 403, BSD, OB, SPEC, V
21:24-22:8	V, ARG, ID, R, FRE 403, MIL	18:16-19:8; 19:16-20:12; 20:22-21:6; 21:8-15; 22:9-13; 23:9-19; 23:22-24:13; 24:15-25:12; 25:14-26:5; 26:16-27:8; 56:4-7; 56:11-14; 56:21-57:8; 57:21-58:9	R, 403, BSD, FOW, H, OB, SPEC, V
22:14-23:8	V, ARG, ID, R, FRE 403, MIL	18:16-19:8; 19:16-20:12; 20:22-21:6; 21:8-15; 22:9-13; 23:9-19; 23:22-24:13; 24:15-25:12; 25:14-26:5; 26:16-27:8; 56:4-7; 56:11-14; 56:21-57:8; 57:21-58:9	R, 403, BSD, FOW, H, OB, SPEC, V
23:20-21	V, ARG, ID, R, FRE 403, MIL	18:16-19:8; 19:16-20:12; 20:22-21:6; 21:8-15; 22:9-13; 23:9-19; 23:22-24:13; 24:15-25:12; 25:14-26:5; 26:16-27:8; 56:4-7; 56:11-14; 56:21-57:8; 57:21-58:9	R, 403, BSD, FOW, H, OB, SPEC, V
29:3-24	L/SOL, R, FRE 403, MIL		
30:2-13	L/SOL, R, FRE 403, MIL		
30:16-20	L/SOL, R, FRE 403, MIL		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-LPS)			
Witness: Ryan, Allison			
Date of Deposition: 2021-08-13			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
30:22-31:6	L/SOL, R, FRE 403, MIL	18:16-19:8; 19:16-20:12; 20:22-21:6; 21:8-15; 22:9-13; 23:9-19; 23:22-24:13; 24:15-25:12; 25:14-26:5; 26:16-27:8; 56:4-7; 56:11-14; 56:21-57:8; 57:21-58:9	R, 403, BSD, FOW, H, OB, SPEC, V
39:7-14	V, O, AF, FN, R, FRE 403, MIL	37:16-21; 38:7-20; 39:1-6	R, 403, BSD, FOW, H, V
41:9-42:5	V, O, ARG, AF, FN, R, FRE 403, MIL	42:22-43:3	R, 403, BSD, FOW, V
43:8-44:2	V, AF, FN, R, FRE 403, MIL	44:3-20	R, 403, BSD, FOW, V
44:24-45:12	V, AF, FN, R, FRE 403, MIL	42:22-43:3	R, 403, BSD, FOW, V
45:20-21	V, AF, FN, R, FRE 403, MIL	42:22-43:3; 46:4-5; 46:9-17; 46:23-47:5	R, 403, BSD, OB, SPEC, V
45:23-46:3	V, AF, FN, R, FRE 403, MIL	42:22-43:3; 46:4-5; 46:9-17; 46:23-47:5	R, 403, BSD, OB, SPEC, V
48:5-22	MIS, ARG, R, FRE 403, MIL		
48:25-49:1	MIS, ARG, R, FRE 403, MIL		
50:10-17	MIS, ARG, R, FRE 403, MIL	49:5-12; 49:23-50:8	R, 403, FOW, OB, V
68:11-14	L/SOL, R, FRE 403, MIL	64:6-9; 64:11-15; 64:17-65:1; 65:4-15; 65:17-22; 65:23-66:14; 67:22-68:3	R, 403, BSD, FOW, SPEC, V
72:3-4	BRPL, R, FRE 403, MIL		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-LPS)			
Witness: Ryan, Allison			
Date of Deposition: 2021-08-13			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
72:11-24	L, O, R, FRE 403, MIL	18:16-19:8; 19:16-20:12; 20:22-21:6; 21:8-15; 22:9-13; 23:9-19; 23:22-24:13; 24:15-25:12; 25:14-26:5; 26:16-27:8; 56:4-7; 56:11-14; 56:21-57:8; 57:21-58:9; 75:19-76:4	R, 403, BSD, H, OB, SPEC, V
73:2-6	L, O, R, FRE 403, MIL	18:16-19:8; 19:16-20:12; 20:22-21:6; 21:8-15; 22:9-13; 23:9-19; 23:22-24:13; 24:15-25:12; 25:14-26:5; 26:16-27:8; 56:4-7; 56:11-14; 56:21-57:8; 57:21-58:9; 75:19-76:4	R, 403, BSD, H, OB, SPEC, V
73:13-15	L, O, R, FRE 403, MIL		
73:24-74:9	L, O, R, FRE 403, MIL	18:16-19:8; 19:16-20:12; 20:22-21:6; 21:8-15; 22:9-13; 23:9-19; 23:22-24:13; 24:15-25:12; 25:14-26:5; 26:16-27:8; 56:4-7; 56:11-14; 56:21-57:8; 57:21-58:9; 75:19-76:4	R, 403, BSD, H, OB, SPEC, V
74:12-16	L, O, R, FRE 403, MIL	18:16-19:8; 19:16-20:12; 20:22-21:6; 21:8-15; 22:9-13; 23:9-19; 23:22-24:13; 24:15-25:12; 25:14-26:5; 26:16-27:8; 56:4-7; 56:11-14; 56:21-57:8; 57:21-58:9; 75:19-76:4	R, 403, BSD, H, OB, SPEC, V
74:19-22	L, O, R, FRE 403, MIL		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-LPS)			
Witness: Ryan, Allison			
Date of Deposition: 2021-08-13			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
75:4-12	L, O, R, FRE 403, MIL	18:16-19:8; 19:16-20:12; 20:22-21:6; 21:8-15; 22:9-13; 23:9-19; 23:22-24:13; 24:15-25:12; 25:14-26:5; 26:16-27:8; 56:4-7; 56:11-14; 56:21-57:8; 57:21-58:9; 75:19-76:4; 77:11-22; 77:24-78:11; 80:4-17; 80:19-81:5; 115:19-116:20; 117:2-8; 118:2-9; 118:19-121:1	R, 403, BSD, I, H, OB, SPEC, V
75:15-17	L, O, R, FRE 403, MIL	18:16-19:8; 19:16-20:12; 20:22-21:6; 21:8-15; 22:9-13; 23:9-19; 23:22-24:13; 24:15-25:12; 25:14-26:5; 26:16-27:8; 56:4-7; 56:11-14; 56:21-57:8; 57:21-58:9; 75:19-76:4; 77:11-22; 77:24-78:11; 80:4-17; 80:19-81:5; 115:19-116:20; 117:2-8; 118:2-9; 118:19-121:1	R, 403, BSD, I, H, OB, SPEC, V
81:7-9	ARG, L, O, V, R, FRE 403, MIL	80:4-17; 80:19-81:5; 84:7-13; 115:19-116:20; 117:2-8; 118:2-9; 118:19-121:1	R, 403, BSD, I, OB, SPEC, V
81:13-16	ARG, L, O, V, R, FRE 403, MIL	80:4-17; 80:19-81:5; 84:7-13; 115:19-116:20; 117:2-8; 118:2-9; 118:19-121:1	R, 403, BSD, I, OB, SPEC, V
85:2-5	L, V, O, FRE 403, MIL		FOW
85:24-25	MIS, L, O, R, FRE 403, MIL	86:10-20; 115:19-116:20; 117:2-8; 118:2-9; 118:19-121:1	R, 403, BSD, I, OB, SPEC, V
86:4-8	MIS, L, O, R, FRE 403, MIL	86:10-20; 115:19-116:20; 117:2-8; 118:2-9; 118:19-121:1	R, 403, BSD, I, OB, SPEC, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-LPS)			
Witness: Ryan, Allison			
Date of Deposition: 2021-08-13			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
87:22-88:7	L, O, V, ARG	18:16-19:8; 19:16-20:12; 20:22-21:6; 21:8-15; 22:9-13; 23:9-19; 23:22-24:13; 24:15-25:12; 25:14-26:5; 26:16-27:8; 56:4-7; 56:11-14; 56:21-57:8; 57:21-58:9; 75:19-76:4; 77:11-22; 77:24-78:11; 80:4-17; 80:19-81:5; 115:19-116:20; 117:2-8; 118:2-9; 118:19-121:1	R, 403, BSD, I, H, OB, SPEC, V
88:11-14	L, O, V, ARG	18:16-19:8; 19:16-20:12; 20:22-21:6; 21:8-15; 22:9-13; 23:9-19; 23:22-24:13; 24:15-25:12; 25:14-26:5; 26:16-27:8; 56:4-7; 56:11-14; 56:21-57:8; 57:21-58:9; 75:19-76:4; 77:11-22; 77:24-78:11; 80:4-17; 80:19-81:5; 115:19-116:20; 117:2-8; 118:2-9; 118:19-121:1	R, 403, BSD, I, H, OB, SPEC, V
88:17-20	L, O, V, ARG	18:16-19:8; 19:16-20:12; 20:22-21:6; 21:8-15; 22:9-13; 23:9-19; 23:22-24:13; 24:15-25:12; 25:14-26:5; 26:16-27:8; 56:4-7; 56:11-14; 56:21-57:8; 57:21-58:9; 75:19-76:4; 77:11-22; 77:24-78:11; 80:4-17; 80:19-81:5; 115:19-116:20; 117:2-8; 118:2-9; 118:19-121:1	R, 403, BSD, I, H, OB, SPEC, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-LPS)			
Witness: Ryan, Allison			
Date of Deposition: 2021-08-13			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
88:24-89:3	L, O, V, ARG	18:16-19:8; 19:16-20:12; 20:22-21:6; 21:8-15; 22:9-13; 23:9-19; 23:22-24:13; 24:15-25:12; 25:14-26:5; 26:16-27:8; 56:4-7; 56:11-14; 56:21-57:8; 57:21-58:9; 75:19-76:4; 77:11-22; 77:24-78:11; 80:4-17; 80:19-81:5; 115:19-116:20; 117:2-8; 118:2-9; 118:19-121:1	R, 403, BSD, I, H, OB, SPEC, V
99:14-15	MIS, ARG, R, FRE 403, MIL	97:9-20; 97:22-98:2; 98:4-8	R, 403, BSD, OB, SPEC, V
99:18-20	MIS, ARG, R, FRE 403, MIL	97:9-20; 97:22-98:2; 98:4-8	R, 403, BSD, OB, SPEC, V
101:25-102:4	L, O, S, R, FRE 403, MIL	97:9-20; 97:22-98:2; 98:4-8	R, 403, BSD, OB, SPEC, V
102:8-11	L, O, S, R, FRE 403, MIL	97:9-20; 97:22-98:2; 98:4-8	R, 403, BSD, OB, SPEC, V
106:8-9	BRPL, L, R, FRE 403, MIL		FOW
106:12-107:2	BRPL, L, R, FRE 403, MIL		FOW
107:8-14	MIS, L, O, R, FRE 403, MIL	18:16-19:8; 19:16-20:12; 20:22-21:6; 21:8-15; 22:9-13; 23:9-19; 23:22-24:13; 24:15-25:12; 25:14-26:5; 26:16-27:8; 56:4-7; 56:11-14; 56:21-57:8; 57:21-58:9; 75:19-76:4; 77:11-22; 77:24-78:11; 80:4-17; 80:19-81:5; 115:19-116:20; 117:2-8; 118:2-9; 118:19-121:1	R, 403, BSD, I, H, OB, SPEC, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-LPS)			
Witness: Ryan, Allison			
Date of Deposition: 2021-08-13			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
107:17-20	MIS, L, O, R, FRE 403, MIL	18:16-19:8; 19:16-20:12; 20:22-21:6; 21:8-15; 22:9-13; 23:9-19; 23:22-24:13; 24:15-25:12; 25:14-26:5; 26:16-27:8; 56:4-7; 56:11-14; 56:21-57:8; 57:21-58:9; 75:19-76:4; 77:11-22; 77:24-78:11; 80:4-17; 80:19-81:5; 115:19-116:20; 117:2-8; 118:2-9; 118:19-121:1	R, 403, BSD, I, H, OB, SPEC, V
107:22-108:7	MIS, L, O, R, FRE 403, MIL, PRIV		
108:9-14	MIS, L, O, R, FRE 403, MIL, PRIV		FOW
110:10-14	L, O, V, R, FRE 403, MIL	110:15-16	R, 403, FOW, V
111:15-21	L, O, V, R, FRE 403, MIL		
112:1-2	L, O, V, R, FRE 403, MIL		
112:4-16	L, O, V, ARG, R, FRE 403, MIL	110:15-16	R, 403, V
112:19-23	L, O, V, ARG, R, FRE 403, MIL	110:15-16	R, 403, V
113:1-2	L, O, V, ARG, R, FRE 403, MIL	110:15-16	R, 403, BSD, V
113:4-5	L, O, V, ARG, R, FRE 403, MIL	110:15-16	R, 403, BSD, V
113:11-12	L, O, V, ARG, R, FRE 403, MIL	110:15-16	R, 403, BSD, V
113:19	L, O, V, ARG, R, FRE 403, MIL	110:15-16	R, 403, BSD, V

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Sakarya, Onur			
Date of Deposition: 2021-07-23			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
9:19-23	PRIVACY		FOW
14:17-21	R, MIL, FRE 403, ID	21:13-16	R, V, 403, FOW
67:10-19	V, AF, FN, ID, R, FRE 403, MIL	40:5-11	R, V, 403, OB, BSD, FOW
70:15-71:11	FRE 403, L, O, V, R, MIL, ID	40:5-11	R, V, 403, OB, BSD, FOW
115:1-16	AF, FN, L, O, R, FRE 403, MIL, ID	113:21-114:25; 115:17-116:3	R, V, 403, MIS, NR, OB, BSD, FOW
123:22-124:3	AF, FN, L, O, R, FRE 403, MIL, ID		FOW
124:25	AF, FN, L, O, R, FRE 403, MIL, ID	114:21-25; 115:17-116:3	R, V, 403, MIS, NR, OB, BSD, FOW
125:3-6	AF, FN, L, O, R, FRE 403, MIL, ID	114:21-25; 115:17-116:3	R, V, 403, MIS, NR, OB, BSD, FOW
133:13-15	AF, FN, L, O, R, FRE 403, MIL, ID, PRIV	126:23-25; 127:3-5; 128:16-19	R, V, 403, MIS, NR, BSD, FOW
133:19	AF, FN, L, O, R, FRE 403, MIL, ID, PRIV	26:23-25; 127:3-5; 128:16-19	R, V, 403, MIS, NR, BSD, FOW
134:6-135:8	AF, FN, L, O, R, FRE 403, MIL, ID, PRIV	126:23-25; 127:3-5; 128:16-19; 140:6-22; 146:11-21	R, V, 403, MIS, NR, BSD, FOW
135:10-12	AF, FN, L, O, R, FRE 403, MIL, ID, PRIV	140:6-22; 146:11-21	R, V, 403, MIS, NR, BSD, FOW
135:15-18	AF, FN, L, O, R, FRE 403, MIL, ID, PRIV	140:6-22; 146:11-21	R, V, 403, MIS, NR, BSD, FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Wong, Alexander			
Date of Deposition: 2021-08-19			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
5:11-15	PRIVACY		
9:6-9	AF, ID, R, FRE 403, MIL		FOW
10:9-12	AF, ID, R, FRE 403, MIL		FOW
14:18-22	BRPL, H, AF, S, L, R, FRE 403, C, IE, FN, O, MIL		FOW
15:2-4	BRPL, H, AF, S, L, R, FRE 403, C, IE, FN, O, MIL		FOW
15:11-13	BRPL, H, AF, S, L, R, FRE 403, C, IE, FN, O, MIL		FOW
15:16-16:1	BRPL, H, AF, S, L, R, FRE 403, C, IE, FN, O, MIL		FOW
17:3-13	BRPL, H, AF, FN, R, FRE 403, L, O, MIL, ID, ARG, C, IE	19:16-25	FOW, R, 403, V, BSD
17:16-19	BRPL, H, AF, FN, R, FRE 403, L, O, MIL, ID, ARG, C, IE	19:16-25	R, 403, V, BSD
20:18-20	AF, FN, R, FRE 403, L, O, MIL, ID, ARG, C, IE	19:16-25	R, 403, V, BSD
20:23-21:1	AF, FN, R, FRE 403, L, O, MIL, ID, ARG, C, IE	19:16-25	R, 403, V, BSD
21:15-20	AF, FN, R, FRE 403, L, O, MIL, ID, ARG, C, IE	19:16-25	R, 403, V, BSD

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Wong, Alexander			
Date of Deposition: 2021-08-19			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
21:22-22:1	AF, FN, R, FRE 403, L, O, MIL, ID, ARG, C, IE	19:16-25	R, 403, V, BSD
22:3-8	AF, FN, R, FRE 403, L, O, MIL, ID, ARG	19:16-25	R, 403, V, BSD
22:12-20	AF, FN, R, FRE 403, L, O, MIL, ID, ARG	19:16-25	R, 403, V, BSD
22:23-25	AF, FN, R, FRE 403, L, O, MIL, ID, ARG	19:16-25	R, 403, V, BSD
23:2-22	AF, FN, R, FRE 403, L, O, MIL, ID, ARG	19:16-25	FOW, R, 403, V, BSD
23:25-24:5	AF, FN, R, FRE 403, L, O, MIL, ID, ARG	19:16-25	R, 403, V, BSD
28:19-21	BRPL, H		
29:1-18	AF, FN, R, FRE 403, MIL, ID, ARG, S, C, IE	30:12-20	R, 403
29:21-24	AF, FN, R, FRE 403, MIL, ID, ARG, S, C, IE	30:12-20	R, 403
32:2-9	AF, FN, R, FRE 403, MIL, ID, ARG, S, C, IE	30:12-20	R, 403
32:11-12	AF, FN, R, FRE 403, MIL, ID, ARG, S, C, IE	30:12-20	R, 403
32:14-17	AF, FN, R, FRE 403, MIL, ID, ARG, S, C, IE	30:12-20	R, 403
32:19-23	AF, FN, R, FRE 403, MIL, ID, ARG, S, C, IE	30:12-20	R, 403
41:24-42:2	AF, FN, L, O, R, FRE 403, MIL, ID	41:5-22	R, 403

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Wong, Alexander			
Date of Deposition: 2021-08-19			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
42:4-8	AF, FN, L, O, R, FRE 403, MIL, ID	41:5-22	R, 403
45:1-2	AF, FN, L, O, R, FRE 403, MIL, V, ID	45:8-16; 25:14-20	R, 403, BSD
45:4-6	AF, FN, L, O, R, FRE 403, MIL, V, ID	45:8-16; 25:14-20	R, 403, BSD
46:6-8	AF, FN, L, O, R, FRE 403, MIL, V, ID	46:25-47:10; 79:17-80:1	R, 403, V, OB, NR, BSD
46:10-12	AF, FN, L, O, R, FRE 403, MIL, V, ID	46:25-47:10; ; 79:17-80:1	R, 403, V, OB, NR, BSD
46:14-16	AF, FN, L, O, R, FRE 403, MIL, V, MIS, ID	46:25-47:10; ; 79:17-80:1	R, 403, V, OB, NR, BSD
46:19-23	AF, FN, L, O, R, FRE 403, MIL, V, MIS, ID	46:25-47:10; ; 79:17-80:1	R, 403, V, OB, NR, BSD
53:8-14	FRE 403, AF, FN, L, V, S, L, R, MIL, ID	52:14-53:7	FOW, R, 403, V, NR, BSD
66:18-24	AF, FN, L, O, R, FRE 403, MIL, ID	63:20-64:9; 68:15-25; 70:7-13	R, 403, V, NR, BSD
67:2-7	AF, FN, L, O, R, FRE 403, MIL, ID	63:20-64:9; 68:15-25; 70:7-13	R, 403, V, NR, BSD
81:14-82:12	FRE 403, L, S, R, MIL, ID	82:14-83:3	FOW, R, 403, V, BSD
83:4-16	FRE 403, S, R, MIL, FN, AF		FOW
85:10-12	FRE 403, S, R, MIL, FN, AF, ID	83:23-85:6	R, 403, V, OB, BSD
85:14-16	FRE 403, S, R, MIL, FN, AF, ID	83:23-85:6	R, 403, V, OB, BSD
92:3-4	L, O, R, FRE 403, MIL	98:21-25; 99:2-8; 99:10-14; 99:24-101:3; 103:10-105:5; 105:15-106:4; 108:4-12; 109:8-110:2	BSD, R, 403, V, SPEC, O, OB, LC, NR

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Wong, Alexander			
Date of Deposition: 2021-08-19			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
92:7-9	L, O, R, FRE 403, MIL	98:21-25; 99:2-8; 99:10-14; 99:24-101:3; 103:10-105:5; 105:15-106:4; 108:4-12; 109:8-110:2	BSD, R, 403, V, SPEC, O, OB, LC, NR
92:11-15	L, O, R, FRE 403, MIL, ARG	98:21-25; 99:2-8; 99:10-14; 99:24-101:3; 103:10-105:5; 105:15-106:4; 108:4-12; 109:8-110:2	BSD, R, 403, V, SPEC, O, OB, LC, NR
92:18-19	L, O, R, FRE 403, MIL, ARG	98:21-25; 99:2-8; 99:10-14; 99:24-101:3; 103:10-105:5; 105:15-106:4; 108:4-12; 109:8-110:2	BSD, R, 403, V, SPEC, O, OB, LC, NR
94:3-5	L, O, R, FRE 403, MIL, ARG, MIS	98:21-25; 99:2-8; 99:10-14; 99:24-101:3; 103:10-105:5; 105:15-106:4; 108:4-12; 109:8-110:2	BSD, R, 403, V, SPEC, O, OB, LC, NR
94:9-11	L, O, R, FRE 403, MIL, ARG, MIS	98:21-25; 99:2-8; 99:10-14; 99:24-101:3; 103:10-105:5; 105:15-106:4; 108:4-12; 109:8-110:2	BSD, R, 403, V, SPEC, O, OB, LC, NR
94:22-25	L, O, R, FRE 403, MIL, ARG, MIS	98:21-25; 99:2-8; 99:10-14; 99:24-101:3; 103:10-105:5; 105:15-106:4; 108:4-12; 109:8-110:2	BSD, R, 403, V, SPEC, O, OB, LC, NR
95:2-3	L, O, R, FRE 403, MIL, ARG, MIS	98:21-25; 99:2-8; 99:10-14; 99:24-101:3; 103:10-105:5; 105:15-106:4; 108:4-12; 109:8-110:2	BSD, R, 403, V, SPEC, O, OB, LC, NR
95:13-24	L, O, R, FRE 403, MIL, ARG, MIS	98:21-25; 99:2-8; 99:10-14; 99:24-101:3; 103:10-105:5;	FOW, BSD, R, 403, V, SPEC, O, OB, LC, NR

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Wong, Alexander			
Date of Deposition: 2021-08-19			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
		105:15-106:4; 108:4-12; 109:8-110:2	
98:21-25; 99:2-8; 99:10-14; 99:24-101:3; 103:10-105:5; 105:15-106:4; 108:4-12; 109:8-110:2	L, O, R, FRE 403, MIL, ARG, MIS		BSD, R, 403, V, SPEC, O, OB, LC, NR

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Zimmermann, Bernhard			
Date of Deposition: 2021-08-25			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
10:3-6	PRIVACY		
11:16-18			
15:23-16:2			
16:4-17	SC		FOW
17:1-2	SC		FOW
17:4-8	SC		FOW
17:15-18	SC		FOW
17:20	SC		
17:22-23	SC		
17:25	SC		
18:1-7	SC		FOW
18:9-11	SC		
18:14	SC		
26:1-2	L, O		
26:5-7	V, L, O		
26:9-20	V, R, FRE 403		FOW
28:4-10	V, L, O, FN, R, FRE 403		FOW
28:13-17	V, L, O, FN, R, FRE 403		
28:19-24	V, L, O, FN, R, FRE 403		FOW
29:3-6	V, L, O, FN, R, FRE 403	29:8-9	FOW, 403, LW
29:12-13			
29:16-30:3	V, R, FRE 403		FOW
30:5	V, R, FRE 403		
31:2-8	S, O, L, FN, R, FRE 403	32:14-16; 32:20-22	FOW, BSD, R, 403, LW
31:11-13	S, O, L, FN, R, FRE 403	32:14-16; 32:20-22	BSD, R, 403, LW
31:15-20	S, O, L, FN, R, FRE 403	32:14-16; 32:20-22	BSD, R, 403, LW
31:24-32:3	S, O, L, FN, R	32:14-16; 32:20-22	BSD, R, 403, LW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Zimmermann, Bernhard			
Date of Deposition: 2021-08-25			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
32:5-8	S, O, L, FN,R	32:14-16; 32:20-22	BSD, R, 403, LW
33:4-12	FN, L, O, R, FRE 403	32:14-16; 32:20-22	BSD, R, 403, LW
33:16-25	FN, L, O, R, FRE 403	32:14-16; 32:20-22	FOW, BSD, R, 403, LW
34:2-4	FN, S, R, FRE 403, O		
34:7-13	FN, S, R, FRE 403, O		
34:16-18	FN, S, SC, R, FRE 403, L, O		
34:25-35:1	FN, S, SC, R, FRE 403, L, O		
35:3-5	L, O, FRE 403, R, V, S, FN		
35:9-11	L, O, FRE 403, R, V, S, FN		
35:13-14	L, O, FRE 403, R, V, FN, S		FOW
35:19-24	L, O, FRE 403, R, V, S, FN		
36:2	L, O, FRE 403, R, V, FN		
36:5-9	L, O, FRE 403, R, V, FN		
36:11	L, O, FRE 403, R, V, FN		
36:14-22	L, O, FRE 403, R, V, S, FN		
36:24-37:2	L, O, FRE 403, R, V, S, FN		
37:6-8	FN, S, O, ARG, L, FRE 403, V, R		
37:10-11	FN, S, O, ARG, L, FRE 403, V, R		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Zimmermann, Bernhard			
Date of Deposition: 2021-08-25			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
37:15-19	FN, S, O, ARG, L, FRE 403, V, R		
43:3-8	R, FRE 403		FOW
45:1-12	FRE 403, O, S, R, FN, V	44:19-25; 47:7-10; 47:14-16	BSD, FOW, R, 403, LW
48:3-6	FRE 403, O, S, R, FN, V		FOW
48:24-49:3	FRE 403, R, O, FN, S, V	49:4-7	FOW, R, 403, LW
49:18-50:2	FRE 403, FN, S, O, R, V	51:20-22; 51:25-52:1; 52:3-5	BSD, FOW, R, 403, LW
54:23-24	FRE 403, R		FOW
55:1	FRE 403, R		FOW
55:5-8	FRE 403, R		FOW
55:10-18	V, R, FRE 403, FN, S, O	55:19-20; 55:22-56:1	FOW, 403, LW
63:2-9	S, FN, O, R, FRE 403, L, V	55:19-20; 55:22-56:1	FOW, BSD, R, 403, LW
63:18-64:6	S, FN, O, L, R, FRE 403, V	55:19-20; 55:22-56:1	FOW, BSD, R, 403, LW
64:10-14	S, FN, O, L, R, FRE 403, V	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
64:16-25	S, FN, O, L, R, FRE 403, V	72:10-13; 72:17-23; 73:2-6	FOW, BSD, R, 403, V, LW
65:4-5	S, FN, O, L, R, FRE 403, V	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
65:7-10	MIS, FN, S, O, L, R, FRE 403, V	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
65:15-17	MIS, FN, S, O, L, R, FRE 403, V	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
65:19-20	FN, S, O, L, R, FRE 403, V	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Zimmermann, Bernhard			
Date of Deposition: 2021-08-25			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
65:24-66:1	FN, S, O, L, R, FRE 403, V	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
73:8-10	FN, S, O, L, R, FRE 403, V	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
73:14-16	FN, S, O, L, R, FRE 403, V	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
73:18	V, O, R, FRE 403, FN, S	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
73:21-74:12	V, O, R, FRE 403, FN, S	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
75:9-11	FN, S, R, FRE 403, V, O	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
75:15-16	FN, S, R, FRE 403, V, O	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
75:18-22	FN, S, R, FRE 403, V, O	72:10-13; 72:17-23; 73:2-6	FOW, BSD, R, 403, V, LW
76:3-6	FN, S, R, FRE 403, V, O	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
76:8	S, FN, O, R, FRE 403, V	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
76:12-20	S, FN, O, R, FRE 403, V	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
76:22	S, O, V, R, FRE 403, FN	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
76:25-77:8	S, O, V, R, FRE 403, FN	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
77:10	S, O, V, R, FRE 403, FN	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
77:13-14	S, O, V, R, FRE 403, FN	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
77:16-17	S, O, V, R, FRE 403, FN	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
77:20-22	S, O, V, R, FRE 403, FN	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Zimmermann, Bernhard			
Date of Deposition: 2021-08-25			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
77:24	S, O, V, R, FRE 403, FN	72:10-13; 72:17-23; 73:2-6	BSD, R, 403, V, LW
78:2-3	S, O, V, R, FRE 403, FN		
78:21-24	S, O, V, R, FRE 403, FN, MIL	78:10-12; 78:15-20	BSD, R, 403, V, LW
79:3-6	FN, IH, O, L, R, FRE 403, MIL	79:8; 79:11-20; 79:24-80:2; 80:6-13	BSD, R, 403, V, LW
81:17-20			
85:19-22	R, FRE 403, MIL, V, FN	86:13-17; 86:19-21	FOW, BSD, R, 403, LW
87:4-11	FN, O, L, R, FRE 403, S, MIL		FOW
87:14-17	FN, O, L, R, FRE 403, MIL		
87:19-23	FN, O, L, R, FRE 403, MIL		
88:8-13	FN, O, L, R, FRE 403, MIL		
88:20-89:22	FN, O, L, R, FRE 403, MIL		
89:24-90:1	O, L, R, FRE 403, MIL		
90:4-9	O, L, R, FRE 403, MIL		
92:20-93:2	MIS, S, O, L, R, FRE 403, MIL		FOW
93:6-94:3	MIS, S, O, L, R, FRE 403, MIL		
97:11-12	V, O, L, R, FRE 403, FN, S		
97:17-18	V, O, L, R, FRE 403, FN, S		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Zimmermann, Bernhard			
Date of Deposition: 2021-08-25			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
97:20-24	AF, S, R, L, O, FRE 403, FN, V		FOW
98:2-4	AF, S, R, L, O, FRE 403, FN, V		
98:6-9	L, O, S, R, FRE 403		FOW
98:12-15	L, O, S, R, FRE 403		
104:11-15			
104:21-106:8	FN, S, O, L, IH, R, FRE 403, S		FOW
106:13-19	FN, S, O, L, IH, R, FRE 403		
106:21-22	FN, S, O, L, IH, R, FRE 403		
107:1-3	FN, S, O, L, IH, R, FRE 403		
107:5-7	AF O, S, L, R, FRE 403		
107:10-12	AF O, S, L, R, FRE 403		
107:14-17	O, FN, MIS, L, R, FRE 403		
107:21-108:18	O, FN, MIS, L, R, FRE 403		
114:18-22	V, O, L, R, FRE 403, MIL, S		
114:25-115:8	V, O, L, R, FRE 403, MIL, S	115:9-10	NR, R, 403, LW
116:6-10	V, O, L, SC, R, FRE 403, MIL, S	115:19-22; 115:25-116:1; 116:3-5	NR, BSD, R, 403, LW
116:14-22	V, O, L, SC, R, FRE 403, MIL, S		
116:24-117:11	V, O, L, SC, R, FRE 403, MIL, S		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Zimmermann, Bernhard			
Date of Deposition: 2021-08-25			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
117:14-19	V, O, L, R, FRE 403, MIL, S		
117:21-25	V, O, L, R, FRE 403, MIL, S		FOW
127:8-9	V, O, L, R, FRE 403, MIL, S		FOW
128:5-6	V, O, S, L, R, FRE 403, MIL		FOW
129:5-7	V, O, S, L, R, FRE 403, MIL		
129:10-12	V, O, S, L, R, FRE 403, MIL	129:14-15; 129:19-22; 130:17-20; 130:24-25	BSD, NR, R, 403, LW
131:13-19	O, V, IH, L, R, FRE 403, S		FOW
134:5-13	O, V, IH, L, R, FRE 403, S	131:23-132:2; 132:6-10; 132:19-24; 133:2-11	FOW, BSD, R, 403, LW
134:16-18	O, V, IH, L, R, FRE 403, S	131:23-132:2; 132:6-10; 132:19-24; 133:2-11	BSD, R, 403, LW
135:4-12	R, FRE 403, L, O, FN, S, V	136:13-16; 136:20-137:1	FOW, BSD, R, 403, LW
139:10-12	O, FN, S, L, R, FRE 403		
139:15-17	O, FN, S, L, R, FRE 403		
139:19-21	O, IH, V, L, S, R, FRE 403		
139:24-140:13	O, IH, V, L, S, R, FRE 403		
140:15-19	O, V, FN, L, S, R, FRE 403		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Zimmermann, Bernhard			
Date of Deposition: 2021-08-25			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
140:22-141:1	O, V, FN, L, S, R, FRE 403		
141:3-9	O, S, FN, L, R, FRE 403		
141:13-16	O, S, FN, L, R, FRE 403		
141:18-20	O, MIS, V, FN, L, R, FRE 403		
141:24-142:24	O, MIS, V, FN, L, R, FRE 403		
143:2-6	O, S, FN, L, R, FRE 403		
145:4-8	V, FN, R, FRE 403, MIL		
145:11-14	V, FN, R, FRE 403, MIL		
145:16-21	V, S, IH, O, L, R, FRE 403, MIL		
145:25-146:1	V, S, IH, O, L, R, FRE 403, MIL		
146:3-6	V, S, O, L, R, FRE 403, MIL		
146:9-12	V, S, O, L, R, FRE 403, MIL		
146:14-20	S, O, FRE 403, R		
146:23-24	S, O, FRE 403, R		
147:2-3	S, O, FRE 403, R		
147:6-10	S, O, FRE 403, R		
147:12-14	S, IH, O, FRE 403, R		
147:18-148:1	S, IH, O, R, FRE 403		
151:11-15	R, FRE 403		FOW
151:17-152:19	V, S, O, FN, R, FRE 403, L		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Zimmermann, Bernhard			
Date of Deposition: 2021-08-25			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
152:23-153:1	V, S, O, FN, R, FRE 403, L		FOW
153:3-6	S, O, V, FN		FOW
153:9-10	S, O, V, FN		
153:12-25	S, O, V, FN	154:1-2; 154:5-14	FOW, R, 403, LW
159:5-8	S, FN, ID, R, FRE 403, V		
159:11-13	S, FN, ID, R, FRE 403, V	157:21-24; 158:3-5; 158:7-9; 158:12-20; 159:14-160:3	BSD, R, 403, NR, O, LW
172:1-2			
172:8-11	R, FRE 403, MIL, V, FN		FOW
172:24-173:12	MIS, V, FN, S, R, FRE 403, MIL		FOW
173:15-16	MIS, V, FN, S, R, FRE 403, MIL		
173:18-21	MIS, V, FN, S, R, FRE 403, MIL	173:22-174:1; 174:4-7	FOW
178:18-19	L, S, FN, R, FRE 403, MIL, V	175:9-11; 175:15-21; 175:23-176:2	R, 403, BSD, LW
178:22-179:1	L, S, FN, R, FRE 403, MIL, V		
179:3-4	S, ARG, C, R, FRE 403, MIL		
179:7-13	S, ARG, C, R, FRE 403, MIL		
179:15-17	MIS, S, R, FRE 403, MIL		
179:21-180:2	MIS, S, R, FRE 403, MIL		
180:4-5	S, ARG, C, R, FRE 403, MIL		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Zimmermann, Bernhard			
Date of Deposition: 2021-08-25			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
180:8-11	S, ARG, C, R, FRE 403, MIL	181:13-17; 181:21-182:2	R, 403, BSD, V, SPEC, LW
187:4-6			
187:12-17	R, FRE 403, MIL, FN, V		FOW
187:22-24	AF, FN, ID, R, FRE 403, MIL, V, S		
188:2-8	AF, FN, ID, R, FRE 403, MIL, V, S		
188:10-19	AF, FN, R, FRE 403, MIL, V, S		FOW
188:22-24	AF, FN, R, FRE 403, MIL, V, S		
189:18-22	R, FRE 403, MIL		
189:24-190:14	MIS, FRE 403, MIL, S, V, FN, R		FOW
190:17-18	MIS, FRE 403, MIL, S, V, FN, R		
190:20-191:6	MIS, FRE 403, MIL, S, V, FN, R		FOW
191:13-192:5	V, FRE 403, MIL, S, V, FN, R		FOW
192:7-8	V, FRE 403, MIL, S, V, FN, R		
197:15-18	R, 403		FOW
201:5-8	MIS, AF, L, ARG, C, S, V, MIL, R, FRE 403		
201:12-24	MIS, AF, L, ARG, C, S, V, MIL, R, FRE 403	202:2-5; 202:9-18	V, 403, LW
203:3-8	ARG, C, L, AF, CD, OBJ, S, MIL, R, FRE 403, V		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Zimmermann, Bernhard			
Date of Deposition: 2021-08-25			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
203:12-17	ARG, C, L, AF, CD, OBJ, S, V, FN, MIL, R, FRE 403		
203:19-20	AF, L, S, V, FN, MIL, R, FRE 403		
203:23-204:5	AF, L, S, V, FN, MIL, R, FRE 403		
204:7-9	L, PRIV, S, V, FN, MIL, R, FRE 403	204:10-13	OB, LW, 403
204:14-15	L, PRIV, S, V, FN, MIL, R, FRE 403		
209:12-14	S, FN, SC, MIL, R, FRE 403		
209:18-22	S, FN, SC, MIL, R, FRE 403		
209:24-210:1	AF, IH, FN, ARG, C, MIL, R, FRE 403		
210:4-6	AF, IH, FN, ARG, C, MIL, R, FRE 403		
210:19-20	ARG, C, S, FN, V, MIL, R, FRE 403	210:21-25	OB, LW, 403
211:1-6	ARG, C, S, FN, V, MIL, R, FRE 403		
217:12-18	V, L, O, S, FN, R, FRE 403, MIL		FOW
217:21-22	V, L, O, S, FN, R, FRE 403, MIL		
217:24-25	V, L, O, S, FN, R, FRE 403, MIL		
218:3-4	V, L, O, S, FN, R, FRE 403, MIL		
218:22-24	V, L, O, S, FN, R, FRE 403, MIL		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Zimmermann, Bernhard			
Date of Deposition: 2021-08-25			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
219:1-2	V, L, O, S, FN, R, FRE 403, MIL		
219:4-11	V, L, O, FN, S, FN, R, FRE 403, MIL		FOW
219:14-23	V, L, 403, O, S, FN, R, MIL		FOW
220:3-9	SC, L, O, S, FN, R, FRE 403, MIL		FOW
220:17-221:19	SC, L, AF, O, S, FN, R, FRE 403, MIL		FOW
221:23-222:1	SC, L, AF, O, R, S, FN, FRE 403, MIL		
223:10-12	FN, L, O, S, R, FRE 403, MIL	222:14-16; 222:25-223:9	R, 403, I, LW
223:15-19	FN, L, O, S, R, FRE 403, MIL		
226:3-6	V, O, L, R, FRE 403, MIL	226:14-20	BSD, R, 403, LW
226:8-9	V, O, L, R, FRE 403, MIL		
228:3-4	L, FN, O, S, R, FRE 403, MIL		
228:7-21	L, FN, O, S, R, FRE 403, MIL		
229:8-16	IH, V, O, CD, S, FN, L, R, FRE 403, MIL		
229:19-24	IH, V, O, CD, S, FN, L, R, FRE 403, MIL		
233:19-25	O, IH, L, S, FN, L, R, FRE 403, MIL	231:23-232:2; 232:5-7	BSD, R, 403, LW
234:3-6	O, IH, L, S, FN, L, R, FRE 403, MIL	233:6-7; 233:10-15	BSD, R, 403, LW
234:8-10	O, IH, L, S, FN, L, R, FRE 403, MIL		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Zimmermann, Bernhard			
Date of Deposition: 2021-08-25			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
234:14	O, IH, L, S, FN, L, R, FRE 403, MIL		
234:16-19	O, IH, L, S, FN, L, R, FRE 403, MIL		
234:21-22	O, IH, L, S, FN, L, R, FRE 403, MIL		
234:24-235:3	O, IH, L, S, FN, L, R, FRE 403, MIL		
235:7-14	O, IH, L, S, FN, L, R, FRE 403, MIL		
235:18-20	O, IH, L, S, FN, L, R, FRE 403, MIL		
235:22-236:1	V, O, L, S, FN, L, R, FRE 403, MIL		
236:5-8	V, O, L, S, FN, L, R, FRE 403, MIL		
237:4-6	V, ARG, C, IH, AF, FN, S, R, FRE 403, O		
237:10-16	V, ARG, C, IH, AF, FN, S, R, FRE 403, O		
237:18-21	MIS, L, O, S, V, FN, R, FRE 403, MIL		
237:25-238:7	MIS, L, O, S, V, FN, R, FRE 403, MIL		
242:17-21	IH, L, O, V, FN, S, R, FRE 403, MIL		
243:1-3	IH, L, O, V, FN, S, R, FRE 403, MIL		
243:5-10	IH, L, O, V, FN, S, R, FRE 403, MIL		
243:20-22	L, O, V, FN, S, R, FRE 403, MIL		
243:25-244:2	L, O, V, FN, S, R, FRE 403, MIL		

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Zimmermann, Bernhard			
Date of Deposition: 2021-08-25			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
244:4-6	IH, L, O, V, FN, S, R, FRE 403, MIL		
244:9	IH, L, O, V, FN, S, R, FRE 403, MIL		
244:11	IH, L, O, V, FN, S, R, FRE 403, MIL		
244:13-14	IH, L, O, V, FN, S, R, FRE 403, MIL		
245:3-4	IH, L, O, V, FN, S, R, FRE 403, MIL		
245:7-8	IH, O, L, FN, V, S, R, FRE 403, MIL		
245:10-16	IH, O, L, FN, V, S, R, FRE 403, MIL		
245:19-246:10	IH, O, L, FN, V, S, R, FRE 403, MIL		
246:12-14	IH, O, L, FN, V, S, R, FRE 403, MIL		FOW
248:3-12	ARG, C, O, L, FN, V, S, R, FRE 403, MIL		FOW
248:15-249:1	ARG, C, O, L, FN, V, S, R, FRE 403, MIL		
252:15-18	FN, O, L, S, V, R, FRE 403, MIL		
252:22-253:6	FN, O, L, S, V, R, FRE 403, MIL		
253:14-16	FN, O, L, S, V, R, FRE 403, MIL		
253:19-20	FN, O, L, S, V, R, FRE 403, MIL		
253:25-254:7	FN, O, L, S, V, R, FRE 403, MIL		FOW
259:15-18	FN, L, S, V, R, FRE 403, MIL		FOW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Zimmermann, Bernhard			
Date of Deposition: 2021-08-25			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
260:7-8	FN, L, S, V, R, FRE 403, MIL		
260:11-18	FN, L, S, V, R, FRE 403, MIL		
260:20-21	FN, L, S, V, R, FRE 403, MIL		
260:24-25	FN, L, S, V, R, FRE 403, MIL		
261:13-14	FN, L, S, V, R, FRE 403, MIL	262:6-7; 262:10-24; 261:15-16	R, 403, LW
261:17-262:4	FN, L, S, V, R, FRE 403, MIL		
263:2-3	FN, L, S, V, R, FRE 403, MIL		
263:6-16	FN, L, S, V, R, FRE 403, MIL	263:18-19; 263:22-264:12	R, 403, LW
264:14-15	FN, L, S, V, R, FRE 403, MIL		
264:18-19	FN, L, S, V, R, FRE 403, MIL		
264:21-23	FN, L, S, V, R, FRE 403, MIL		
265:1-2	FN, L, S, V, R, FRE 403, MIL		
265:4-5	FN, L, S, V, R, FRE 403, MIL		
265:8-13	FN, L, S, V, R, FRE 403, MIL		
265:23-24	FN, L, S, V, R, FRE 403, MIL		
266:1-7	FN, L, S, V, R, FRE 403, MIL	266:9-10; 266:13-24; 267:2-4	R, 403, LW

Natera, Inc. v. ArcherDX, Inc. (Case No. 1:20-cv-00125-GBW)			
Witness: Zimmermann, Bernhard			
Date of Deposition: 2021-08-25			
Defendants' Opening Designations	Natera's Objections	Natera's Counter-Designations	Defendants' Objections
267:14-15	FN, L, S, V, R, FRE 403, MIL		
267:17-24	FN, L, S, V, R, FRE 403, MIL		

EXHIBIT 10

Exhibit 10: Natera's Trial Exhibit List

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0001	Natera Lab Notebook 00021 [Constantin 2.24.2014]	NAT-AR-00105699-NAT-AR-00105816	R, 403, A, C, H, LK		
PTX-0002	Natera Lab Notebook 00001 [Zimmermann 5.3.2012]	NAT-AR-00107605-NAT-AR-00107700	R, 403, C, H		
PTX-0003	Natera Lab Notebook B4 [Hill 2.26.2010]	NAT-AR-00106123-NAT-AR-00106282	R, 403, A, C, H, LK		
PTX-0004	Natera Lab Notebook A2 [Baner 8.1.2006]	NAT-AR-00106924-NAT-AR-00107090	R, 403, A, C, H, LK		
PTX-0005	Natera Lab Notebook B3 [Zimmermann 1.2.2011]	NAT-AR-00106752-NAT-AR-00106923	R, 403, C, H		
PTX-0006	Natera Lab Notebook A1 [Baner 10.7.2006]	NAT-AR-00106598-NAT-AR-00106751	R, 403, A, C, H, LK		
PTX-0007	Natera Lab Notebook 00011 [Baner 3.23.2013]	NAT-AR-00106498-NAT-AR-00106597	R, 403, A, C, H, LK		
PTX-0008	Natera Lab Notebook 00013 [Constantin 1.21.2013]	NAT-AR-00105526-NAT-AR-00105698	R, 403, A, C, H, LK		
PTX-0009	Natera Lab Notebook XXX15 [Zimmermann 11.13.2012]	NAT-AR-00121072-NAT-AR-00121280	R, 403, C, H		
PTX-0010	Natera Lab Notebook A7 [Baner 11.23.2009]	NAT-AR-00105817-NAT-AR-00106122	R, 403, A, C, H, LK		
PTX-0011	Natera Lab Notebook A4 [Baner 3.6.2008]	NAT-AR-00106310-NAT-AR-00106497	R, 403, A, C, H, LK		
PTX-0012	Natera Lab Notebook B2 [Zimmermann 2.18.2011]	NAT-AR-00107091-NAT-AR-00107297	R, 403, C, H		
PTX-0013	Natera Lab Notebook A8 [Baner 9.15.2010]	NAT-AR-00107298-NAT-AR-00107604	R, 403, A, C, H, LK		
PTX-0014	2020-02-05 Reny Aniline Business Review Presentation	NAT-AR-00118448-NAT-AR-00118456	R, 403, A, C, H, IO, LK		
PTX-0015	2020-06-12 Natera MRD Commercial Questionnaire	NAT-AR-00121620-NAT-AR-00121638	R, 403, A, C, H, IO, LK		
PTX-0016	Masucci, Max (February 18, 2020) Private company innovation – Biodesix, ArcherDX, Freenome, Biotheranostics, & Akoya Bio. <i>Canaccord Genuity LLC (US)</i>	NAT-AR-00121608-NAT-AR-00121619	R, 403, A, C, H, LK		
PTX-0017	SOW #1 - Evaluation of Natera Technology	NAT-AR-00433411-NAT-AR-00433414	R, 403, C		
PTX-0018	2020-09-17 SVBLEERINK Natera Company Report	NAT-AR-00121646-NAT-AR-00121736	R, 403, A, C, DU, H, LK		
PTX-0019	2020-07-22 Genentech Cathaya NSCLC JPT Meeting Presentation	NAT-AR-00418917-NAT-AR-00418945	R, 403, A, C, H, LK		
PTX-0020	Swanton and Abbosh (2017), Phylogenetic ctDNA analysis depicts early-stage lung cancer evolution, Nature Vol. 545	NAT-AR-00104619-NAT-AR-00104639	R, 403, A, C, CU, H, LK		
PTX-0021	Summary of analytical and clinical data for Signatera: Seeing beyond the limit: Detect residual disease and assess treatment response	NAT-AR-00434671-NAT-AR-00434679	R, 403, A, C, H, IO, LK		
PTX-0022	U.S. Patent No. 10,017,812	NAT-AR-00107701-NAT-AR-00107806	R, 403, A, C, H, LK		
PTX-0023	2020-10-14 Natera Oncology Pharma Offering Presentation	NAT-AR-00702371-NAT-AR-00702434	R, 403, A, C, H, IO, LK		
PTX-0024	2019-02-08 Natera Letter to FDA re Breakthrough Device Designation Request Q-Submission	NAT-AR-00118565-NAT-AR-00118600	R, 403, A, C, H, IO, LK		
PTX-0025	Spreadsheet: Parameters for Assay Design	NAT-AR-00281759	R, 403, A, C, H, LK		
PTX-0026	Natera News Release: Medicare Issues Draft Local Coverage Determination for Signatera™ in Immunotherapy Response Monitoring	NAT-AR-00189593-NAT-AR-00189595	R, 403, A, C, H, LK		
PTX-0027	2019-07-02 Moffitt Cancer Center Letter to Natera re Signatera assay Medicare	NAT-AR-00434498-NAT-AR-00434499	R, 403, A, C, H, LK		
PTX-0028	2019-06-16 Foundation Medicine & Natera Term Sheet	NAT-AR-00432658-NAT-AR-00432676	R, 403, A, C, H, LK		
PTX-0029	A Closer Look At Liquid Biopsy: Background, Key Players & Market Opportunity, November 10, 2014, Cowen and Company	NAT-AR-00347684-NAT-AR-00347699	R, 403, A, C, H, LK		
PTX-0030	2016-01-13 Lung Therapy Market and Product Assessment Presentation	NAT-AR-00435644-NAT-AR-00435658	R, 403, A, C, CU, H, IO, LK		
PTX-0031	Signatera Plasma Laboratory Workflow SOP DOC-10085	NAT-AR-00189550-NAT-AR-00189582	R, 403, A, C, H, LK		
PTX-0032	2020-06-18 Signatera vs TracerX 2020 Presentation	NAT-AR-00432262-NAT-AR-00432267	R, 403, A, BE, C, H, LK		
PTX-0033	Spreadsheet: Master Pharma RUO Project	NAT-AR-00432074	R, 403, A, C, H, LK		
PTX-0034	Statement of Work: CA209-9TN Natera Signatera ctDNA test	NAT-AR-00430153-NAT-AR-00430159	R, 403, C		
PTX-0035	2019-04-15 Non-GxP Services Agreement between Natera Inc. and Genentech, Inc.	NAT-AR-00430210-NAT-AR-00430230	R, 403, C, CU		
PTX-0036	2020-07-24 Natera AstraZeneca draft term sheet to Master Diagnostic Development and Commercialisation Agreement	NAT-AR-00702475-NAT-AR-00702495	R, 403, A, C, H, LK		
PTX-0037	2019-04-15 Non-GxP Services Agreement between Natera Inc. and Genentech, Inc.	NAT-AR-00430189-NAT-AR-00430209	R, 403, C, CU		
PTX-0038	2015-12-17 Lung Therapy Market and Product Assessment Presentation	NAT-AR-00435630-NAT-AR-00435643	R, 403, A, C, CU, H, IO, LK		
PTX-0039	2019-12-18 Master Clinical Contract Services Agreement between Elicio Therapeutics and Natera	NAT-AR-00432568-NAT-AR-00432591	R, 403, C		
PTX-0040	2018-05-02 Natera Commercial Milestones Presentation	NAT-AR-00434352-NAT-AR-00434422	R, 403, A, C, H, LK		
PTX-0041	Oncology at Natera Presentation	NAT-AR-00435582-NAT-AR-00435596	R, 403, A, C, H, LK		
PTX-0042	2018-08-10 Master Laboratory Services Agreement between Bristol-Myers Squibb and Natera	NAT-AR-00432430-NAT-AR-00432463	R, 403, C		
PTX-0043	2019-12-18 First Amendment to Master Clinical Services Agreement between Natera and Elicio Therapeutics	NAT-AR-00148353-NAT-AR-00148356	R, 403, C		
PTX-0044	Spreadsheet: Signatera Revenue Projection	NAT-AR-00128532	R, 403, A, C, H, LK		
PTX-0045	2018-03-22 Master Services Agreement between natera and Aduro Biotech	NAT-AR-00432415-NAT-AR-00432427	R, 403, C		
PTX-0046	2018-02-21 Master Contract Services Agreement between Deciphera Pharmaceuticals and Natera	NAT-AR-00432525-NAT-AR-00432545	R, 403, C		
PTX-0047	Natera: Colorectal Cancer ATU Survey Results January to June 2020 Presentation	NAT-AR-00432767-NAT-AR-00432840	R, 403, A, C, CU, H, LK		
PTX-0048	Natera ATU Survey Results January 2020 Presentation	NAT-AR-00432841-NAT-AR-00432890	R, 403, A, C, CU, H, LK		
PTX-0049	2019-10-10 Natera Oncology Call Presentation	NAT-AR-00281644-NAT-AR-00281662	R, 403, A, C, H, IO, LK		
PTX-0050	Spreadsheet: Onc Model v41	NAT-AR-00432072	R, 403, A, C, H, LK		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0051	Spreadsheet: Prospective Trials Report	NAT-AR-00128841	R, 403, A, C, H, LK		
PTX-0052	Spreadsheet: Onc Model v32	NAT-AR-00128843	R, 403, A, C, H, LK		
PTX-0053	Spreadsheet: Onc Base Model v1	NAT-AR-00432221	R, 403, A, C, H, LK		
PTX-0054	2020-08-03 Signatera Personalized MRD Test	NAT-AR-00434751-NAT-AR-00435248	R, 403, A, C, H, IO, LK		
PTX-0055	2019-05-06 Email from Zimmermann to Chapman re Plasma WES for CS	NAT-AR-00172639-NAT-AR-00172649	R, 403, A, C, CU, H, IO, LK		
PTX-0056	2020-10-16 Email from Alexeeva to BiopharmaBD re BD-specific Marketing Updates - Oct 16, 2020	NAT-AR-00598909-NAT-AR-00598911	R, 403, A, C, H, LK		
PTX-0057	2018-03-13 Email from Rabinowitz to Moshkevich re Swanton terms	NAT-AR-00280262-NAT-AR-00280263	R, 403, C, CU, H		
PTX-0058	2018-03-20 Email from Moshkevich to Rabinowitz re Swanton terms	NAT-AR-00280268-NAT-AR-00280269	R, 403, C, H		
PTX-0059	2020-03-10 Email from Aniline to Moshkevich re MRD testing in Breast Cancer Ph3 study	NAT-AR-00289927-NAT-AR-00289931	R, 403, A, C, H, IO, LK		
PTX-0060	2019-02-20 Email from Zimmerman to Moshkevich re Abbosh/Swanton	NAT-AR-00297315-NAT-AR-00297318	R, 403, C, H		
PTX-0061	2020-09-27 Email from Schenkel to Rabinowitz re Key Observations From The 2020 Cowen Liquid Biopsy Summit - Cowen and Company	NAT-AR-00305624-NAT-AR-00305625	R, 403, A, BE, C, H, LK		
PTX-0062	2018-05-03 Email from Sigurjonsson to Zimmermann re TRACERx	NAT-AR-00310898-NAT-AR-00310902	R, 403, C, H		
PTX-0063	2018-08-09 Oncology Strategy Review Presentation	NAT-AR-00347873-NAT-AR-00347898	R, 403, A, C, H, LK		
PTX-0064	2020-01-03 Draft Laboratory Services Agreement between Pfizer and Natera	NAT-AR-00704187-NAT-AR-00704257	R, 403, A, C, H, LK		
PTX-0065	2019-02-22 Email from Aleshin to Moshkevich re NATERA MRD	NAT-AR-00274092-NAT-AR-00274098	R, 403, A, C, H, LK		
PTX-0066	2017-10-06 Email from Chapman to Rabinowitz re Update on swanton	NAT-AR-00287362	R, 403, A, C, H, LK		
PTX-0067	2019-05-14 Email from Chapman to Dantone re Plasma WES for CS	NAT-AR-00193905-NAT-AR-00193919	R, 403, A, C, H, LK		
PTX-0068	2017-10-17 Email from Moshkevich to Fesko re Friday 2-4	NAT-AR-00287268	R, 403, C, H		
PTX-0069	2020-06-01 Ares Design Review Presentation for Scientific JSCConcept/Feasibility Stage for FMI-based Natera Assay Presentation	NAT-AR-00599745-NAT-AR-00599781	R, 403, A, C, H, LK		
PTX-0070	2020-09-24 Piper Sandler Natera Company Note: Hot Off The Press From Palmetto: Draft LCD for Cancer Agnostic MRD Testing	NAT-AR-00130876-NAT-AR-00130879	R, 403, A, C, H, LK		
PTX-0071	2020-09-17 SVBLEERINK Natera Company Report	NAT-AR-00130885-NAT-AR-00130975	R, 403, A, C, DU, H, LK		
PTX-0072	2017-09-12 Email from Moshkevich to Rabinowitz re Swanton note	NAT-AR-00301338	R, 403, C, H		
PTX-0073	2017-06-22 Email from Swanton to Rabinowitz re Achilles/Natera	NAT-AR-00300812	R, 403, A, C, H, LK		
PTX-0074	2019-02-24 Email from Swenerton to Moshkevich re Leicester paper - Seracare validation	NAT-AR-00297393-NAT-AR-00297398	R, 403, A, C, H, LK		
PTX-0075	2020-10-08 Email from Dupray to Brophy re NTRA -- Flash / Oncology Dx & Liquid Biopsy Summit Takeaways From Our NTRA Management Meeting / Outperform	NAT-AR-00653111-NAT-AR-00653114	R, 403, A, C, H, IO, LK		
PTX-0076	2020-10-08 Email from Souda to Brophy re NVTa -- Flash / Oncology Dx & Liquid Biopsy Summit Takeaways From Our NVTa Management Meeting / Outperform	NAT-AR-00148471-NAT-AR-00148473	R, 403, A, C, H, LK		
PTX-0077	2020-07-20 Email from Schueren to Moshkevich re Here it is...GNE asking about PhIII NSCLC!!!	NAT-AR-00302533-NAT-AR-00302537	R, 403, A, C, H, LK		
PTX-0078	2020-04-14 Email from Hsu to Oncology Sales Team re Oncology Marketing Announcements - April 14, 2020	NAT-AR-00596283-NAT-AR-00596285	R, 403, A, C, H, LK		
PTX-0079	2018-02-08 Email from Lindquist to Chapman re Swanton	NAT-AR-00280270-NAT-AR-00280274	R, 403, A, C, H, IO, LK		
PTX-0080	2017-06-07 Email from Dantone to Salari re comp analysis	NAT-AR-00301079-NAT-AR-00301092	R, 403, A, C, H, LK		
PTX-0081	2019-10-10 Email from Schenkel to Brophy re QUICK TAKE - NTRA - NTRA Recaps YTD Progress With Signatera Liquid Biopsy Platform - Cowen and Company	NAT-AR-00282311-NAT-AR-00282313	R, 403, A, C, H, LK		
PTX-0082	2019-10-31 Email from Cerniglia to Fesko re WES/Plasma timelines	NAT-AR-00291184-NAT-AR-00291188	R, 403, A, BE, C, H, LK		
PTX-0083	2020-04-24 Email from Schwarzbach to Oncology Marketing re Article in Precision Oncology, Inivata & Natera	NAT-AR-00617962	R, 403, A, BE, C, H, LK		
PTX-0084	Spreadsheet: Signatera MolDx Gapfill pricing worksheet	NAT-AR-00598895	R, 403, A, C, H, LK		
PTX-0085	2020-05-01 Summary of Settlement Terms between Illumina and Natera	NAT-AR-00439790-NAT-AR-00439795	R, 403, 408, A, C, H, LK		
PTX-0086	2020-11-15 Laboratory Services Agreement between Criterion and Natera	NAT-AR-00441157-NAT-AR-00441170	R, 403, C		
PTX-0087	2019-02-20 License Agreement between natera and BGI	NAT-AR-00441462-NAT-AR-00441515	R, 403, A, C, H, LK		
PTX-0088	2020-09-03 Email from Fesko to Huang re Signatera CRC Final LCD	NAT-AR-00190620	R, 403, C		
PTX-0089	2020-08-29 Laboratory Services Agreement between Astellas and Natera	NAT-AR-00440944-NAT-AR-00440981	R, 403, C		
PTX-0090	Sept. 2020 FMI-Natera/Signatera Studies JSC Request for Approval Presentation	NAT-AR-00654442-NAT-AR-00654446	R, 403, A, C, H, LK		
PTX-0091	2020-10-06 Service Agreement between GlaxoSmithKline and Natera	NAT-AR-00703938-NAT-AR-00703991	R, 403, C		
PTX-0092	2020-09-22 Signatera pricing dossier	NAT-AR-00441088-NAT-AR-00441092	R, 403, A, C, H, LK		
PTX-0093	2019-11-25 Collaboration Agreement between The University of Texas MD and Natera	NAT-AR-00441072-NAT-AR-00441083	R, 403, C		
PTX-0094	2018-12-21 Material Transfer and Technology Evaluation Agreement between Natera and AMAL Therapeutics	NAT-AR-00440990-NAT-AR-00441001	R, 403, C		
PTX-0095	2020-03-30 JF GSK Presentation	NAT-AR-00289935-NAT-AR-00289936	R, 403, A, C, DE, H, LK		
PTX-0096	Genomic Health Natera Non-Binding Term Sheets	NAT-AR-00704075-NAT-AR-00704077	R, 403, A, C, H, LK		
PTX-0097	2020-08-21 Draft In Vitro Diagnostics Master Collaboration Agreement between AstraZeneca and Natera	NAT-AR-00702496-NAT-AR-00702584	R, 403, A, C, H, LK		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0098	Christensen, Emil, 2019 May 6, Early Detection of Metastatic Relapse and Monitoring of Therapeutic Efficacy by Ultra-Deep Sequencing of Plasma Cell-Free DNA in Patients With Urothelial Bladder Carcinoma	NAT-AR-00290052-NAT-AR-00290063	R, 403, A, C, H, LK		
PTX-0099	2019-04-13 Email from Huang to Bergen-Bartel re Natera/Intralink - Japan BDPartnering/Initiative	NAT-AR-00285808-NAT-AR-00285828	R, 403, A, C, H, LK		
PTX-0100	2020-09-28 Morgan Stanley Natera Company Report	NAT-AR-00131593-NAT-AR-00131622	R, 403, A, C, DU, H, LK		
PTX-0101	July 2020 FMI-Natera JSC Update Presentation	NAT-AR-00148955-NAT-AR-00148986	R, 403, A, C, H, LK		
PTX-0102	Natera 2015 Annual Report	NAT-AR-00803655-NAT-AR-00803786	R, 403, A, C, H, LK		
PTX-0103	2015-08-11 Natera Overview Oncology Presentation	NAT-AR-00354289-NAT-AR-00354329	R, 403, A, C, DU, H, LK		
PTX-0104	2020-07-13 Email from Moshkevich to Masukawa re Inivata data	NAT-AR-00192310-NAT-AR-00192311	R, 403, A, BE, C, H, LK		
PTX-0105	2020-08-10 Genentech Competitive Landscape A deeper look into Signatera Presentation	NAT-AR-00441399-NAT-AR-00441428	R, 403, A, BE, C, H, LK		
PTX-0106	Spreadsheet: FMI Model v07	NAT-AR-00592863	R, 403, A, C, H, LK		
PTX-0107	Statement of Work No. 1 (SOW #1) Signatera Standard Project	NAT-AR-00702590-NAT-AR-00702592	R, 403, A, C, H, LK		
PTX-0108	2020-08-18 Email from Rivers to Zimmermann re [confluence] Research & Development Primer Designability Analysis Plan	NAT-AR-00200914-NAT-AR-00200916	R, 403, A, C, H, LK		
PTX-0109	Spreadsheet: Opportunity Planner GSK Tesaro TNBC	NAT-AR-00594703	R, 403, A, C, H, LK		
PTX-0110	2020-08-29 Natera Oncology Commercial Milestones Presentation	NAT-AR-00569960-NAT-AR-00570007	R, 403, A, C, H, LK		
PTX-0111	2019-03-22 Amendment to Statement of Work to the Master Services Agreement between AstraZeneca and Natera	NAT-AR-00443313-NAT-AR-00443318	R, 403, C		
PTX-0112	2019-11-30 Non-Clinical Service Agreement between Natera and Genentech	NAT-AR-00451461-NAT-AR-00451481	R, 403, C		
PTX-0113	2019-07-18 Signatera - US Clinical Sales Plan Presentation	NAT-AR-00609910-NAT-AR-00609933	R, 403, A, C, H, LK		
PTX-0114	Jen Choiniere Account Summary	NAT-AR-00598000-NAT-AR-00598005	R, 403, A, C, DE, H, LK		
PTX-0115	2019-11-28 GxP Services Agreement between Natera and Genentech	NAT-AR-00703889-NAT-AR-00703933	R, 403, C		
PTX-0116	Natera Consortia Presentation	NAT-AR-00654397-NAT-AR-00654403	R, 403, A, C, H, LK		
PTX-0117	2018-11-26 Master Services Agreement between AstraZeneca and Natera	NAT-AR-00439473-NAT-AR-00439510	R, 403, C		
PTX-0118	Statement of Work No. 1 (SOW #1) Signatera Standard CLIA Project	NAT-AR-00703934-NAT-AR-00703937	R, 403, A, C, H, LK		
PTX-0119	2020-02-04 Phama BD PoA Deck Presentation	NAT-AR-00653934-NAT-AR-00653939	R, 403, A, C, H, LK		
PTX-0120	2019-12-18 Master Clinical Contract Services Agreement between Elicio Therapeutics and Natera	NAT-AR-00441177-NAT-AR-00441200	R, 403, C		
PTX-0121	2020-07-15 Wilson Tawe Natera Presentation	NAT-AR-00150388-NAT-AR-00150412	R, 403, A, C, H, IO, LK		
PTX-0122	2015-08-11 Natera BMGL Oncology Presentation	NAT-AR-00354331-NAT-AR-00354371	R, 403, A, C, DU, H, LK		
PTX-0123	Reinert, Thomas (2019) Analysis of Plasma Cell-Free DNA by Ultradeep Sequencing in Patients With Stages I to III Colorectal Cancer, JAMA Oncology.	NAT-AR-00303978-NAT-AR-00303985	R, 403, A, C, H, LK		
PTX-0124	Signatera Investigator Initiated Trial (IIT) Program Initial Concept Submission Form	NAT-AR-00598074-NAT-AR-00598077	R, 403, A, C, H, LK		
PTX-0125	2018-11-26 Amendment to The Statement of Work to the Master Services Agreement between AstraZeneca and Natera	NAT-AR-00594744-NAT-AR-00594749	R, 403, C		
PTX-0126	2019-02-26 MERMAID Trial Presentation	NAT-AR-00441614-NAT-AR-00441643	R, 403, A, BE, C, H, LK		
PTX-0127	2019-07-30 Natera PMDA Pre-Consultation Signatera Test Presentation	NAT-AR-00653441-NAT-AR-00653460	R, 403, A, BE, C, FL, H, LK		
PTX-0128	2018-08-24 Statement of Work CA209-9TN Natera Signatera ctDNA test	NAT-AR-00702615-NAT-AR-00702621	R, 403, C		
PTX-0129	Christensen, Emil (2019) Early Detection of Metastatic Relapse and Monitoring of Therapeutic Efficacy by Ultra-Deep Sequencing of Plasma Cell-Free DNA in Patients with Urothelial Bladder Carcinoma, Journal of Clinical Oncology	NAT-AR-00304486-NAT-AR-00304499	R, 403, A, C, H, LK		
PTX-0130	2018-02-17 Email from Zimmermann to Roeding re BMS UCL MRD study	NAT-AR-00567002-NAT-AR-00567004	R, 403, A, C, H, LK		
PTX-0131	Amendment 1 to Agreement between Natera and Genentech	NAT-AR-00289665-NAT-AR-00289680	R, 403, A, C, H, LK		
PTX-0132	Amendment 1 to Master Services Agreement between Natera and AstraZeneca	NAT-AR-00443328-NAT-AR-00443346	R, 403, A, C, H, LK		
PTX-0133	2019-08-09 License and Collaboration Agreement between Natera and Foundation Medicine	NAT-AR-00443488-NAT-AR-00443549	R, 403, A, C, H, LK		
PTX-0134	2020-08-13 Foundation Medicine Identification of Monitoring Variants from FICDx presentation	NAT-AR-00621751-NAT-AR-00621756	R, 403, A, C, H, LK		
PTX-0135	2020-09-21 Morgan Stanley Key Takeaways From Our Healthcare Conference Article	NAT-AR-00129890-NAT-AR-00129917	R, 403, A, C, H, LK		
PTX-0136	March 2020 Notes on Sensitivity Presentation	NAT-AR-00355639-NAT-AR-00355643	R, 403, A, C, H, LK		
PTX-0137	Natera Signatera Oncology Pharma Services Brochure	NAT-AR-00195141-NAT-AR-00195142	R, 403, A, C, H, LK		
PTX-0138	2020-09-25 Signatera Detect residual disease early. Treat with confidence Presentation	NAT-AR-00352583-NAT-AR-00352694	R, 403, A, C, H, IO, LK		
PTX-0139	2020-09-03 Natera SBR Introduction & Financials Presentation	NAT-AR-00438424-NAT-AR-00438439	R, 403, A, C, H, LK		
PTX-0140	2020-10-07 BTIG Natera Company Report	NAT-AR-00129382-NAT-AR-00129405	R, 403, A, C, H, LK		
PTX-0141	2020-09-28 Morgan Stanley Natera Company Report	NAT-AR-00129312-NAT-AR-00129341	R, 403, A, C, DU, H, LK		
PTX-0142	2020-09-03 Oncology SBR for 2021 Presentation	NAT-AR-00448904-NAT-AR-00448937	R, 403, A, C, H, LK		
PTX-0143	2020-08-26 Natera News Release: Natera's Signatera™ Test Receives CE Mark	NAT-AR-00302760-NAT-AR-00302761	R, 403, A, C, DU, H, LK		
PTX-0144	2018-10-29 Natera 2018 Oncology SPP Signatera & Beyond Presentation	NAT-AR-00446060-NAT-AR-00446087	R, 403, A, C, CU, H, LK		
PTX-0145	Statement of Work - AstraZeneca Signatera Matched Tissue and Plasma Pilot with Natera	NAT-AR-00181923	R, 403, A, C, H, LK		
PTX-0146	2020-05-26 Natera/AZ CAPtello-191 Study Follow-up Items Presentation	NAT-AR-00597595-NAT-AR-00597622	R, 403, A, BE, C, H, LK		
PTX-0147	2018-10-29 Natera 2018 Oncology SPP Signatera & Beyond Presentation	NAT-AR-00446148-NAT-AR-00446176	R, 403, A, C, CU, H, LK		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0148	Spreadsheet: FMI Based Product - Financial Model	NAT-AR-00446051	R, 403, A, C, H, LK		
PTX-0149	2018-10-29 Natera 2018 Oncology SPP Signatera & Beyond Presentation	NAT-AR-00446178-NAT-AR-00446210	R, 403, A, C, CU, H, LK		
PTX-0150	2020-09-17 SVBLEERINK Natera Company Report	NAT-AR-00131663-NAT-AR-00131753	R, 403, A, C, DU, H, LK		
PTX-0151	Spreadsheet: Oncology marketing budgets	NAT-AR-00613304	R, 403, A, C, H, LK		
PTX-0152	Genomic Health-Natera Non-Binding Term Sheets, Redlined	NAT-AR-00702435-NAT-AR-00702437	R, 403, A, C, H, LK		
PTX-0153	2020-04-29 Email from Aniline to Moshkevich re CDx meeting today	NAT-AR-00618039-NAT-AR-00618040	R, 403, A, C, H, LK		
PTX-0154	2020-09-24 Piper Sandler Natera Company Note: Hot Off The Press From Palmetto: Draft LCD for Cancer Agnostic MRD Testing	NAT-AR-00131896-NAT-AR-00131899	R, 403, A, C, H, LK		
PTX-0155	2019-10-21 Early Technology Access and Material Transfer Agreement between Natera and he Royal Marsden NHS Foundation Trust	NAT-AR-00704169-NAT-AR-00704186	R, 403, A, C, H, LK		
PTX-0156	2020-05-29 Email from Alexeeva to Aniline re archer counterdetail	NAT-AR-00597733-NAT-AR-00597741	R, 403, A, C, H, LK		
PTX-0157	2020-05-15 Signatera Pharma Training (Part 2) Presentation	NAT-AR-00597742-NAT-AR-00597780	R, 403, A, C, H, IO, LK		
PTX-0158	2019-05-03 FDA Letter to Natera re Signatera Q190221	NAT-AR-00356996-NAT-AR-00356997	R, 403, A, C, H, LK		
PTX-0159	Abbosh, Christopher (2017) Phylogenetic ctDNA analysis depicts early stage lung cancer evolution, Nature Vol. 000	NAT-AR-00306217-NAT-AR-00306241	R, 403, A, C, CU, H, LK		
PTX-0160	FMI-Based Natera Assay Marketing Requirements Overview Presentation	NAT-AR-00305314-NAT-AR-00305323	R, 403, A, C, H, LK		
PTX-0161	2019-03-25 GxP Services Agreement between Natera and Genentech	NAT-AR-00441535-NAT-AR-00441557	R, 403, C		
PTX-0162	2020-06-04 GCP/GLP Services Agreement between Natera and Genentech	NAT-AR-00702438-NAT-AR-00702474	R, 403, C		
PTX-0163	2019-07-03 Signatera MolDx Submission Z-codes: ZB8DC, ZB8DD	NAT-AR-00200028-NAT-AR-00200080	R, 403, A, C, H, IO, LK		
PTX-0164	Product Requirements for FMI-based Signatera PRD-XXXXX.01	NAT-AR-00310225-NAT-AR-00310235	R, 403, A, C, H, LK		
PTX-0165	Pilot and feasibility plan for FMI-based Product DOC-000XX.01	NAT-AR-00310236-NAT-AR-00310240	R, 403, A, C, H, LK		
PTX-0166	Design and Development Plan DDP for FMI-based Product.01	NAT-AR-00310219-NAT-AR-00310224	R, 403, A, C, H, LK		
PTX-0167	Natera Oncology Update Presentation	NAT-AR-00618810-NAT-AR-00618821	R, 403, C, H		
PTX-0168	Signatera vs TracerX 2020 Presentation	NAT-AR-00619262-NAT-AR-00619270	R, 403, A, C, H, LK		
PTX-0169	Abbosh (2017) Phylogenetic ctDNA analysis depicts early-stage lung cancer evolution, Nature Vol. 545	NAT-AR-00305033-NAT-AR-00305055	R, 403, A, C, H, LK		
PTX-0170	Spreadsheet: Natera Long Range model v24 status quo	NAT-AR-00532079	R, 403, A, C, H, LK		
PTX-0171	2020-01-15 Natera Clinical Update Presentation	NAT-AR-00615323-NAT-AR-00615342	R, 403, A, C, H, IO, LK		
PTX-0172	2018-06-27 Natera June 2018 Investor Call Presentation	NAT-AR-00445384-NAT-AR-00445406	R, 403, A, C, H, IO, LK		
PTX-0173	2019-09-24 Natera Zimmermann Massively and Bespoke Multiplex PCR Presentation	NAT-AR-00451484-NAT-AR-00451513	R, 403, C, H, IO		
PTX-0174	2020-07-11 Natera Archer Data Presentation	NAT-AR-00598188-NAT-AR-00598213	R, 403, A, C, H, IO, LK		
PTX-0175	2020-10-02 Discussion with HOAG Presentation	NAT-AR-00621216-NAT-AR-00621254	R, 403, A, BE, C, H, LK		
PTX-0176	FMI-Based Natera Assay (RUO/IUO) System Architecture Component Design DHF-10250.01	NAT-AR-00169887-NAT-AR-00169893	R, 403, A, C, H, LK		
PTX-0177	2010-10-25 Email from Keller to Sigurjonsson re blastomeres to children	NAT-AR-00146346-NAT-AR-00146347	R, 403, A, C, CU, H, LK		
PTX-0178	2010-12-09 Email from Ryan to Gemelos re snp normalization function released into research	NAT-AR-00570566	R, 403, A, C, H, LK		
PTX-0179	2010-10-25 Email from Sigurjonsson to Keller re blastomeres to children	NAT-AR-00146344-NAT-AR-00146345	R, 403, A, C, H, LK		
PTX-0180	2010-10-25 Email from Keller to Sigurjonsson re blastomeres to children	NAT-AR-00146348-NAT-AR-00146349	R, 403, A, C, H, LK		
PTX-0181	2010-11-08 Email from Ryan to Gemelos re sequence data parsing utilities	NAT-AR-00416708	R, 403, A, C, H, LK		
PTX-0182	2011-03-22 Email from hill to Rabinowitz re Ion Torrent	NAT-AR-00146162-NAT-AR-00146164	R, 403, A, C, CU, H, LK		
PTX-0183	2011-03-23 Email from Zimmermann to Sigurjonsson re Ion Torrent	NAT-AR-00146340-NAT-AR-00146343	R, 403, A, C, H, LK		
PTX-0184	2010-03-01 Email from Ryan to Gemelos re product 4 code moved to research	NAT-AR-00570279	R, 403, A, C, H, LK		
PTX-0185	2011-03-22 Email from Rabinowitz to Zimmermann re Ion Torrent	NAT-AR-00146165-NAT-AR-00146166	R, 403, C, CU, H		
PTX-0186	2010-02-02 Email from Gemelos to Kijacic re Getting ready for a new tag	NAT-AR-00598965	R, 403, A, C, H, LK		
PTX-0187	2011-12-30 Email from Hill to Rabinowitz re getting on same page re npd algorithm	NAT-AR-00146102-NAT-AR-00146105	R, 403, A, C, CU, H, LK		
PTX-0188	2010-04-28 Email from Sheena to Medina re naperville 540 - sequencing complete	NAT-AR-00437714	R, 403, A, C, H, LK		
PTX-0189	2010-02-12 Email from Gemelos to Ryan re Product 4 next steps	NAT-AR-00416713	R, 403, A, C, H, LK		
PTX-0190	2011-12-30 Email from Zimmermann to Rabinowitz re getting on same page re npd algorithm	NAT-AR-00146106-NAT-AR-00146109	R, 403, A, C, CU, H, LK		
PTX-0191	2011-12-30 Email from Rabinowitz to Gemelos re getting on same page re npd algorithm	NAT-AR-00146081-NAT-AR-00146082	R, 403, C, CU, H		
PTX-0192	2011-12-30 Email from Rabinowitz to Hill re getting on same page re npd algorithm	NAT-AR-00146110-NAT-AR-00146112	R, 403, A, C, CU, H, LK		
PTX-0193	2011-12-31 Email from Rabinowitz to Zimmermann re getting on same page re npd algorithm	NAT-AR-00146113-NAT-AR-00146116	R, 403, A, C, H, LK		
PTX-0194	2011-10-25 Email from Zimmermann to Demko re serum samples	NAT-AR-00357256-NAT-AR-00357257	R, 403, C		
PTX-0195	2011-09-06 Email from Dodd to Ryan re Blanked (not masked) mapped data for all D5D6 PCR data from aug 28 sequencing run available	NAT-AR-00146080	R, 403, A, C, H, LK		
PTX-0196	2011-09-07 Email from Ryan to Gemelos re remapped day5 sequences	NAT-AR-00437310	R, 403, A, C, H, LK		
PTX-0197	2011-08-16 Email from Rabinowitz to Gemelos re more extensive runs on targeted PCR protocol	NAT-AR-00436651	R, 403, C, CU		
PTX-0198	2011-08-24 Email from Gemelos to Banjevic re plasma info	NAT-AR-00329926-NAT-AR-00329938	R, 403, A, C, H, LK		
PTX-0199	2011-08-31 Email from Dodd to Zimmermann re Primer design parameters for 1200 plex	NAT-AR-00476981	R, 403, A, C, H, LK		
PTX-0200	2011-08-16 Email from Zimmermann to Dodd re more extensive runs on targeted PCR protocol	NAT-AR-00489580-NAT-AR-00489581	R, 403, C		
PTX-0201	2011-06-02 Email from Rabinowitz to Hill re miniPCR	NAT-AR-00131941-NAT-AR-00131944	R, 403, A, C, H, LK		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0202	2010-11-22 Email from Baner to Zimmermann re wiki	NAT-AR-00146895-NAT-AR-00146897	R, 403, A, BE, C, H, LK		
PTX-0203	2011-05-09 Email from Zimmermann re PicoPlex NGS	NAT-AR-00146132-NAT-AR-00146137	R, 403, A, C, H, LK		
PTX-0204	2011-04-01 Email from Zimmermann to Banjevic re barcoding samples	NAT-AR-00570762-NAT-AR-00570765	R, 403, A, C, H, LK		
PTX-0205	2010-01-07 HMM Presence of Homologs Algorithm	NAT-AR-00517659-NAT-AR-00517663	R, 403, A, C, H, LK		
PTX-0206	Spreadsheet: Mini PCR assays LIST OF SNPs	NAT-AR-00489590	R, 403, A, C, H, LK		
PTX-0207	Spreadsheet: 2011-12-10 PGD protocols	NAT-AR-00121294	R, 403, A, C, H, LK		
PTX-0208	Spreadsheet: 2011-02-20 53-plex pool	NAT-AR-00570766	R, 403, A, C, H, LK		
PTX-0209	2011-03-22 Email from Zimmermann to Hill re Ion Torrent	NAT-AR-00311689	R, 403, C, CU, H		
PTX-0210	Spreadsheet: 2011-07-14 samples for POC mini PCR detects T21	NAT-AR-00482588	R, 403, A, C, H, LK		
PTX-0211	2010-12-03 Email from Zimmermann to Gemelos re Proposed next quantization experiment	NAT-AR-00437808-NAT-AR-00437809	R, 403, A, C, H, LK		
PTX-0212	2011-04-14 Email from Tao to Baner re POC-P4	NAT-AR-00146174-NAT-AR-00146175	R, 403, A, BE, C, H, LK		
PTX-0213	2011-07-20 Email from Zimmermann to Baner re QC protocol qPCR	NAT-AR-00645841	R, 403, C		
PTX-0214	POC-NPD Workflow	NAT-AR-00146176-NAT-AR-00146179	R, 403, A, C, H, LK		
PTX-0215	Spreadsheet: 2011-05-26 NIPD mini PCR protocols	NAT-AR-00120995	R, 403, A, C, H, LK		
PTX-0216	Spreadsheet: 2011-07-14 STA 53plex for QC	NAT-AR-00645842	R, 403, A, C, H, LK		
PTX-0217	2010-02-12 Email from Binkley to Hill re gaucher mutation	NAT-AR-00121067-NAT-AR-00121068	R, 403, A, BE, C, H, LK		
PTX-0218	2011-05-04 Email from Zimmermann to Ryan some basic stats from miniper data	NAT-AR-00645788-NAT-AR-00645789	R, 403, A, C, H, LK		
PTX-0219	2011-05-31 Email from Dodd to Zimmermann re Lower TM primer designs	NAT-AR-00490226	R, 403, A, BE, C, H, LK		
PTX-0220	Spreadsheet: 2011-04-18 50 to 200 plex results GSN2	NAT-AR-00645790	R, 403, A, C, H, LK		
PTX-0221	Spreadsheet: 2011-04-18 53-plex results GSN 1	NAT-AR-00645791	R, 403, A, C, H, LK		
PTX-0222	2010-01-16 Email from Sheena to Johnson re 2010_0108_exp324_SEQ MDA and Genomic Cystic Fibrosis Samples with Primer 3381	NAT-AR-00437937-NAT-AR-00437942	R, 403, A, BE, C, H, LK		
PTX-0223	2010-01-28 Email from Johnson to Olonan re next steps for primer development	NAT-AR-00481850-NAT-AR-00481855	R, 403, A, C, CU, H, LK		
PTX-0224	2010-01-15 Email from Sheena to Hill re Sequencing for variation case 422 complete... processing error occurred	NAT-AR-00482305-NAT-AR-00482312	R, 403, A, C, H, LK		
PTX-0225	2010-02-11 Email from Johnson to Olonan re Primer development case 439 - variation 2 (IVS2+1GA)	NAT-AR-00315827-NAT-AR-00315844	R, 403, A, C, H, LK		
PTX-0226	GSN Aug26 Sequencing results mini-PCR Presentation	NAT-AR-00120776-NAT-AR-00120797	R, 403, A, C, CU, H, LK		
PTX-0227	2010-01-07 Email from Hill to Kearney re Liz needs stats from pre-clinical stuff done for P2	NAT-AR-00481737-NAT-AR-00481741	R, 403, A, C, CU, H, LK		
PTX-0228	2010-01-12 Email from Sheena to Olonan re Sequencing for variation case 422 complete... processing error occurred	NAT-AR-00482313-NAT-AR-00482314	R, 403, A, C, H, LK		
PTX-0229	2011-09-28 Email from Zimmermann to Demko re added data	NAT-AR-00362580	R, 403, C, H		
PTX-0230	2010-01-07 Email from Hill to Kearney re Liz needs stats from pre-clinical stuff done for P2	NAT-AR-00481742-NAT-AR-00481745	R, 403, A, C, CU, H, LK		
PTX-0231	2010-01-28 Email from Johnson to Olonan re next steps for primer development	NAT-AR-00481977-NAT-AR-00481982	R, 403, A, C, CU, H, LK		
PTX-0232	Spreadsheet: gsn Aug28 pcr mapping stats 1200-plex PCR into sequencing	NAT-AR-00362581	R, 403, A, C, H, LK		
PTX-0233	GSN Aug26 Sequencing results mini-PCR Presentation	NAT-AR-00362582-NAT-AR-00362606	R, 403, A, C, H, LK		
PTX-0234	2010-01-04 Email from Miles to Hill re PCR-Seq rework Exp.	NAT-AR-00482158-NAT-AR-00482175	R, 403, A, BE, C, H, LK		
PTX-0235	2011-11-14 Email from Zimmermann to Hill re 11000 plex data	NAT-AR-00357179	R, 403, C		
PTX-0236	2010-01-07 Email from Kearney to Hill re Liz needs stats from pre-clinical stuff done for P2	NAT-AR-00481746-NAT-AR-00481750	R, 403, A, C, CU, H, LK		
PTX-0237	2010-01-27 Email from Olonan to Hill re Sequencing for variation case 422 complete...	NAT-AR-00482377	R, 403, A, C, H, LK		
PTX-0238	Spreadsheet: GBA primers	NAT-AR-00121066	R, 403, A, C, H, LK		
PTX-0239	Spreadsheet: 6321-SEQ analysis CASE422	NAT-AR-00482378	R, 403, A, C, H, LK		
PTX-0240	2011-11-01 Seq Run007 Presentation	NAT-AR-00357180-NAT-AR-00357222	R, 403, A, C, H, LK		
PTX-0241	Spreadsheet: dmd primer info	NAT-AR-00481212	R, 403, A, C, H, LK		
PTX-0242	Spreadsheet: 2010-10-03 combined disease list	NAT-AR-00146215	R, 403, A, C, H, LK		
PTX-0243	2011-06-27 Email from Hill to Gemelos re Roche-nimblegen sequence capture plan	NAT-AR-00571253-NAT-AR-00571254	R, 403, A, C, H, LK		
PTX-0244	2010-10-25 Email from Burriesi to Hill re sunday update	NAT-AR-00481155-NAT-AR-00481158	R, 403, A, C, H, LK		
PTX-0245	2010-11-01 Email from Weng to Baner re sequencing results for flow cell 62MAP	NAT-AR-00480743-NAT-AR-00480745	R, 403, A, C, H, LK		
PTX-0246	2011-11-08 Email from Hill to Banjevic re MI vs MI modeling	NAT-AR-00436650	R, 403, A, C, H, LK		
PTX-0247	2010-04-02 Email from Sheena to Olonan re 2010_0330_exp425_SEQ primer dev -Kansas 843	NAT-AR-00480820-NAT-AR-00480821	R, 403, A, C, H, LK		
PTX-0248	2010-04-02 Email from Baner to Rabinowitz re P4 experiment plan 040210	NAT-AR-00146207-NAT-AR-00146208	R, 403, A, C, H, LK		
PTX-0249	2011-08-26 Email from Demko to Rabinowitz re paternity paper	NAT-AR-00437018-NAT-AR-00437021	R, 403, A, C, H, LK		
PTX-0250	2011-02-03 Email from Ryan to Banjevic re real plasma family 2366	NAT-AR-00570641-NAT-AR-00570642	R, 403, A, C, H, LK		
PTX-0251	2010-12-16 Email from Hill to Zimmermann re had to add another plasma sample for sequencing so I think one of your samples got bumped.	NAT-AR-00479699	R, 403, A, C, H, LK		
PTX-0252	2010-11-09 Email from Hill to Burriesi re 10K+ primers per chrom	NAT-AR-00479737-NAT-AR-00479745	R, 403, A, C, H, LK		
PTX-0253	2010-11-11 Email from Rabinowitz to Hill re lysis protocol -- hydrophilic reagent	NAT-AR-00146190-NAT-AR-00146191	R, 403, A, C, CU, H, LK		
PTX-0254	2010-09-03 Email from Demko to Baner re bioanalyzer data	NAT-AR-00479796-NAT-AR-00479798	R, 403, A, C, H, LK		
PTX-0255	2010-11-11 Email from Hill to Rabinowitz re lysis protocol -- hydrophilic reagent	NAT-AR-00146192-NAT-AR-00146193	R, 403, A, C, CU, H, LK		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0256	2010-11-12 Email from Rabinowitz to Sievert re lysis protocol -- hydrophilic reagent	NAT-AR-00146194-NAT-AR-00146197	R, 403, A, C, H, LK		
PTX-0257	2011-12-19 Email from Hill to Sheena re already run nested primers	NAT-AR-00600598	R, 403, A, C, H, LK		
PTX-0258	Spreadsheet: already run nested primers	NAT-AR-00600599	R, 403, A, C, H, LK		
PTX-0259	2011-12-22 Email from Hill to Olonan re new primer worksheets	NAT-AR-00600606-NAT-AR-00600607	R, 403, A, C, CU, H, LK		
PTX-0260	2011-12-22 Email from Hill to Olonan re Primers	NAT-AR-00600610-NAT-AR-00600611	R, 403, A, C, CU, H, LK		
PTX-0261	Spreadsheet: Nested primers 2011 1201 BLOCK1	NAT-AR-00600609	R, 403, A, C, H, LK		
PTX-0262	Spreadsheet: Nested primers 2011 1201 BLOCK2	NAT-AR-00600608	R, 403, A, C, H, LK		
PTX-0263	Spreadsheet: Nested primers 2011 1201 BLOCK1 MH111222	NAT-AR-00600613	R, 403, A, C, H, LK		
PTX-0264	Spreadsheet: Nested primers 2011 1201 BLOCK2 MH111222	NAT-AR-00600612	R, 403, A, C, H, LK		
PTX-0265	2011-12-13 Email from Olonan to Hill re Existing nested reactions	NAT-AR-00600584-NAT-AR-00600585	R, 403, A, C, H, LK		
PTX-0266	Spreadsheet: Nested primers 2011 1201	NAT-AR-00600586	R, 403, A, C, H, LK		
PTX-0267	GSN Lab R&D Presentation	NAT-AR-00480787-NAT-AR-00480791	R, 403, A, C, CU, H, LK		
PTX-0268	2010-05-13 Email from Medina to Hill re GC rich PCR	NAT-AR-00480727-NAT-AR-00480730	R, 403, A, C, H, LK		
PTX-0269	2010-05-13 Photograph of Gel from PCR	NAT-AR-00480731	R, 403, A, C, H, LK		
PTX-0270	Spreadsheet: Kansas 843 Q493X Round 1-2	NAT-AR-00480472	R, 403, A, C, H, LK		
PTX-0271	Spreadsheet: SEQ analysis summary-7118-SEQ	NAT-AR-00480473	R, 403, A, C, H, LK		
PTX-0272	2010-11-12 Email from Siebert to Hill re lysis protocol -- hydrophilic reagent	NAT-AR-00146198-NAT-AR-00146200	R, 403, A, C, CU, H, LK		
PTX-0273	Lab R&D Presentation	NAT-AR-00481009-NAT-AR-00481013	R, 403, A, C, CU, H, LK		
PTX-0274	Ares Primer Designability RSR-10035.01	NAT-AR-00161888-NAT-AR-00161899	R, 403, A, C, H, LK		
PTX-0275	Ares Feasibility Exit Study EPR-10094.01	NAT-AR-00162853-NAT-AR-00162865	R, 403, A, C, H, LK		
PTX-0276	Design Review Report: NIPT Microdeletions Primer Design DOC-00057.01	NAT-AR-00133435-NAT-AR-00133453	R, 403, A, C, DU, H, LK		
PTX-0277	Design Review Report: NIPT Microdeletions Primer Design DOC-00057.01	NAT-AR-00133416-NAT-AR-00133434	R, 403, A, C, DU, H, LK		
PTX-0278	Signatera Bespoke Primer Pooling SOP DOC-10082.02	NAT-AR-00124978-NAT-AR-00124990	R, 403, A, C, H, LK		
PTX-0279	Signatera Development R&R Study Lab Procedure and record for Repeatability Arm SEC-13030	NAT-AR-00133343-NAT-AR-00133355	R, 403, A, C, H, LK		
PTX-0280	Signatera Development R&R Study Lab Procedure and record for Operator 3 SEC-13029	NAT-AR-00133317-NAT-AR-00133329	R, 403, A, C, H, LK		
PTX-0281	FMI-Based Natera Assay RUO-IUO VnV Screening Protocol SEC-14720 TPR-10154	NAT-AR-00672839-NAT-AR-00672849	R, 403, A, C, H, LK		
PTX-0282	Foundation Medicine and Natera Term Sheet Payments Summary	NAT-AR-00704137	R, 403, A, C, H, LK		
PTX-0283	2019-05-21 Memorial Sloan Kettering Cancer Center and Natera Memorandum of Understanding	NAT-AR-00704138-NAT-AR-00704140	R, 403, C		
PTX-0284	FMI-Natera biopharma talking points and communication strategy	NAT-AR-00202703-NAT-AR-00202704	R, 403, A, C, H, LK		
PTX-0285	2020-06-26 Research Collaboration and Material Transfer Agreement between Natera and Dana Farber (MGH)	NAT-AR-00704141-NAT-AR-00704156	R, 403, C		
PTX-0286	Spreadsheet: SPP priorities - Oncology 2020 v3	NAT-AR-00658787	R, 403, A, C, H, LK		
PTX-0287	2020-09-28 Morgan Stanley Natera Company Report	NAT-AR-00132065-NAT-AR-00132094	R, 403, A, C, DU, H, LK		
PTX-0288	2020-08-14 GCP/GLP Services Agreement between Natera and Genentech	NAT-AR-00317563-NAT-AR-00317598	R, 403, C		
PTX-0289	2019-04-08 Natera Testing Laboratory Technical and Scientific Assessment	NAT-AR-00281522-NAT-AR-00281557	R, 403, A, C, H, LK		
PTX-0290	2019-09-04 Exhibit A Statement of Work re Signatera Analytical Validation between AstraZeneca and Natera	NAT-AR-00169221-NAT-AR-00169241	R, 403, C		
PTX-0291	2019-11-29 GxP Services Agreement between Natera and Genentech	NAT-AR-00704092-NAT-AR-00704136	R, 403, C		
PTX-0292	2014-02-24 License Agreement between Natera and DNA Diagnostics Center	NAT-AR-00703223-NAT-AR-00703249	R, 403, C		
PTX-0293	2019-11-20 Service Agreement between Natera and Merck Sharp & Dohme	NAT-AR-00430285-NAT-AR-00430310	R, 403, C		
PTX-0294	2020-06-01 FMI Ares Design Review Presentation for Scientific JSC	NAT-AR-00658872-NAT-AR-00658908	R, 403, A, C, H, LK		
PTX-0295	2020-08-05 FMI-Based Natera Assay Clinical IDP	NAT-AR-00658955-NAT-AR-00659006	R, 403, A, C, H, LK		
PTX-0296	2020-09-01 Natera Oncology Roadmap Presentation	NAT-AR-00620634-NAT-AR-00620655	R, 403, A, BE, C, H, LK		
PTX-0297	2020-01-21 Natera Signatera Workflow and PCR Schematics Presentation	NAT-AR-00121392-NAT-AR-00121400	R, 403, A, C, H, LK		
PTX-0298	2019-11-14 Natera Board Meeting Presentation	NAT-AR-00612862-NAT-AR-00612923	R, 403, A, C, H, LK		
PTX-0299	2019-03-27 Technical Advantages of Signatera Presentation	NAT-AR-00496308-NAT-AR-00496333	R, 403, A, BE, C, H, LK		
PTX-0300	2020-09-22 Signatera pricing dossier	NAT-AR-00621108-NAT-AR-00621113	R, 403, A, C, H, LK		
PTX-0301	Spreadsheet: 2011-05-17 mini PCR design plan	NAT-AR-00146350	R, 403, A, C, H, LK		
PTX-0302	Mini=PCR workflows Presentation	NAT-AR-00146387-NAT-AR-00146393	R, 403, A, C, H, LK		
PTX-0303	Spreadsheet: 1200-plex sequencing GSN run03	NAT-AR-00146572-NAT-AR-00146598	R, 403, A, C, DE, H, LK		
PTX-0304	Spreadsheet: STA 1200plex DOEs	NAT-AR-00146361	R, 403, A, C, H, LK		
PTX-0305	Spreadsheet: CN calls	NAT-AR-00146707	R, 403, A, C, H, LK		
PTX-0306	New assays	NAT-AR-00132301-NAT-AR-00132310	R, 403, A, C, DE, H, IO, LK		
PTX-0307	Spreadsheet: single cell sequencing	NAT-AR-00146356	R, 403, A, C, H, LK		
PTX-0308	Spreadsheet: E2 Eser results of paternity Dec28	NAT-AR-00146724	R, 403, A, C, H, LK		
PTX-0309	Spreadsheet: STA 11000plex Day 5 recover	NAT-AR-00146364	R, 403, A, C, H, LK		
PTX-0310	Spreadsheet: fetal fraction protocols	NAT-AR-00146367	R, 403, A, C, H, LK		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0311	2015-08-11 Natera BMGL Oncology Presentation	NAT-AR-00363347-NAT-AR-00363387	R, 403, A, C, DU, H, LK		
PTX-0312	Intentionally Left Blank				
PTX-0313	Spreadsheet: STA 11000plexDay 5	NAT-AR-00146366	R, 403, A, C, H, LK		
PTX-0314	Spreadsheet: PGD protocols	NAT-AR-00146368	R, 403, A, C, H, LK		
PTX-0315	Spreadsheet: single cell sequencing	NAT-AR-00146358	R, 403, A, C, H, LK		
PTX-0316	Spreadsheet: May basic qc	NAT-AR-00146690	R, 403, A, C, H, LK		
PTX-0317	Spreadsheet: paternity plasma sequencing	NAT-AR-00146357	R, 403, A, C, H, LK		
PTX-0318	Transplant rejection monitoring feasibility plan	NAT-AR-00266373-NAT-AR-00266375	R, 403, A, C, H, LK		
PTX-0319	Spreadsheet: STA 1200plex direct and nested	NAT-AR-00146362	R, 403, A, C, H, LK		
PTX-0320	Breast Cancer Panel: Mutation Selection and Primer Design	NAT-AR-00146781-NAT-AR-00146817	R, 403, A, C, DU, H, LK		
PTX-0321	Charter for NIPT Haplotyping (Halo)	NAT-AR-00146743	R, 403, A, C, H, LK		
PTX-0322	Owczarzy, Richard (2005) Melting temperatures of nucleic acids: Discrepancies in analysis, Biophysical Chemistry 117	NAT-AR-00322891-NAT-AR-00322899	R, 403, A, C, H, LK		
PTX-0323	Research and Development Study Report: DiGeorge + chr1, 2 PCR optimization and bias model	NAT-AR-00530312-NAT-AR-00530315	R, 403, A, C, H, LK		
PTX-0324	2011-11-01 Seq_Run007 Presenation	NAT-AR-00146599-NAT-AR-00146644	R, 403, A, C, H, LK		
PTX-0325	CNAPS VIII Notes-v2	NAT-AR-00574635-NAT-AR-00574647	R, 403, A, C, H, IO, LK		
PTX-0326	03032014 Breast_Cancer_Primer_Design.docx	NAT-AR-00146844-NAT-AR-00146869	R, 403, A, C, CU, DU, H, LK		
PTX-0327	Breast Cancer Panel: Mutation Selection and Primer Design	NAT-AR-00146818-NAT-AR-00146843	R, 403, A, C, CU, DU, H, LK		
PTX-0328	American Society of Human Genetics 62nd Annual Meeting Poster	NAT-AR-00321706-NAT-AR-00322670	R, 403, A, C, H, LK		
PTX-0329	AstraZeneca Appendix 1: Third Party Testing Laboratory Technical and Scientific Assessment	NAT-AR-00189387-NAT-AR-00189406	R, 403, A, C, H, LK		
PTX-0330	Research and Development Study Report: Multiplex PCR on Single Cell (Part 2)	NAT-AR-00530307-NAT-AR-00530311	R, 403, A, C, H, LK		
PTX-0331	2016-11-01 Natera Oncology recurrence monitoring opportunity analysisFinal presentation	NAT-AR-00496393-NAT-AR-00496454	R, 403, A, C, H, IO, LK		
PTX-0332	2013-11-25 Distribution of In Vitro Diagnostic Products Labeled for Research Use Only or Investigational Use Only	NAT-AR-00803787-NAT-AR-00803798	R, 403, A, C, H, LK		
PTX-0333	2020-05-23 Exhibit A Statement of Work between Medimmune Limited and Natera	NAT-AR-00430160-NAT-AR-00430164	R, 403, C		
PTX-0334	Intentionally Left Blank				
PTX-0335	2019-03-12 Exhibit A Statement of Work No. 1 between Astrazeneca and Natera	NAT-AR-00169280-NAT-AR-00169287	R, 403, C		
PTX-0336	2020-03-02 Pharma BD PoA Deck Presentation	NAT-AR-00189327-NAT-AR-00189336	R, 403, A, C, CU, H, LK		
PTX-0337	2019-08-30 Amendment No. 1 to Statement of Work Project: NSCLC Pilot between Medimmune and Natera	NAT-AR-00430281-NAT-AR-00430284	R, 403, C		
PTX-0338	2019-09-10 Signatera story board Presentation	NAT-AR-00613086-NAT-AR-00613104	R, 403, A, C, DE, H, LK		
PTX-0339	Spreadsheet: Chart3	NAT-AR-00146540	R, 403, A, C, H, LK		
PTX-0340	2020-02-04 Pharma BD PoA Deck Presentation	NAT-AR-00656092-NAT-AR-00656097	R, 403, A, C, CU, H, LK		
PTX-0341	2020-03-15 Service Agreement between Natera and Merck	NAT-AR-00430248-NAT-AR-00430280	R, 403, C		
PTX-0342	2019-11-25 Amendment No. 1 to Materials Transfer and Technology Evaluation Agreement between Natera and AMAL Therapeutics	NAT-AR-00604799-NAT-AR-00604805	R, 403, C		
PTX-0343	2020-07-10 Amendment 3 (AMD3) to Agreement between Genentech and Natera for Genomics Biomarker Services	NAT-AR-00430231-NAT-AR-00430239	R, 403, C		
PTX-0344	2011-09-19 Spreadsheet of Results from 1200-plex miniPCRs	NAT-AR-00146683	R, 403, A, C, H, LK		
PTX-0345	Jan 2015 Oncology Update Presentation	NAT-AR-00428316-NAT-AR-00428357	R, 403, A, C, H, LK		
PTX-0346	Exhibit B: Neon Lab Work Order	NAT-AR-00704023-NAT-AR-00704024	R, 403, A, C, H, LK		
PTX-0347	Natera Agenus Executed MTA 1-2-18	NAT-AR-00703992-NAT-AR-00703997	R, 403, C		
PTX-0348	BCR_CDR3_tumor_MEDIconfidential.txt	NAT-AR-00184526-NAT-AR-00185689	R, 403, A, C, H, LK		
PTX-0349	Statement of Work - AZ-Natera Matched Tissue and Plasma Signatera pilot 09JAN18 clean.docx	NAT-AR-00187416-NAT-AR-00187418	R, 403, A, C, H, LK		
PTX-0350	Gritstone Oncology, Inc. MTA (Signatera Pharma Pilot) 8.23.17.final.signed	NAT-AR-00704004-NAT-AR-00704009	R, 403, C		
PTX-0351	Neon Natera MTA Amendment 2 08-06-2018 FULLY EXECUTED	NAT-AR-00704014-NAT-AR-00704022	R, 403, C		
PTX-0352	Signatera SOW Standard Project Template Final.docx	NAT-AR-00280622-NAT-AR-00280624	R, 403, A, C, H, LK		
PTX-0353	Signatera Analytical Whitepaper DRAFT	NAT-AR-00533738-NAT-AR-00533748	R, 403, A, C, DE, H, IO, LK		
PTX-0354	SPI-POZ-101 Natera SOW - PE	NAT-AR-00704010-NAT-AR-00704013	R, 403, A, C, H, LK		
PTX-0355	Astrazeneca Breast trial Signatera SOW Proposal 8.13.18AN.docx	NAT-AR-00275731-NAT-AR-00275733	R, 403, A, C, H, LK		
PTX-0356	Genocca MTA	NAT-AR-00703998-NAT-AR-00704003	R, 403, C		
PTX-0357	Re Presentation on Signatera.eml	NAT-AR-00274497-NAT-AR-00274499	R, 403, A, C, H, LK		
PTX-0358	Re # variants in assay vs. sensitivity.eml	NAT-AR-00271797-NAT-AR-00271802	R, 403, A, C, H, LK		
PTX-0359	Incyte MSA fully executed 1-16-19	NAT-AR-00704054-NAT-AR-00704068	R, 403, C		
PTX-0360	Re ASCO.eml	NAT-AR-00173058-NAT-AR-00173061	R, 403, A, C, H, LK		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0361	Signatera Standard Project EMD Pilot SOW #1.docx	NAT-AR-00173062-NAT-AR-00173064	R, 403, A, C, H, LK		
PTX-0362	Spreadsheet: Novartis Overview JC	NAT-AR-00425401	R, 403, A, C, H, IO, LK		
PTX-0363	Natera SenseiBio MSA fully executed 043019	NAT-AR-00425629-NAT-AR-00425649	R, 403, C		
PTX-0364	Natera Sensei Bio SOW #1 051719 FINAL Fully Executed	NAT-AR-00425650-NAT-AR-00425652	R, 403, C		
PTX-0365	190401 - AZ meetings AACR.pptx	NAT-AR-00424437-NAT-AR-00424454	R, 403, A, BE, C, DE, H, LK		
PTX-0366	Fwd Marketing Material Signatera.eml	NAT-AR-00171491-NAT-AR-00171492	R, 403, A, C, H, LK		
PTX-0367	18-1263_Signatera Analytical Validation Whitepaper_101018_JIRA	NAT-AR-00171495-NAT-AR-00171502	R, 403, A, C, DE, H, IO, LK		
PTX-0368	18-1751_Brochure Signatera_111418-JIRA	NAT-AR-00171493-NAT-AR-00171494	R, 403, A, C, H, IO, LK		
PTX-0369	Signatera marketing plan- 2H 2019 v5.pptx	NAT-AR-00656012-NAT-AR-00656027	R, 403, A, C, H, LK		
PTX-0370	Natera & Spectrum Fully Executed 20 July 2018	NAT-AR-00704038-NAT-AR-00704053	R, 403, C		
PTX-0371	Natera Medimmune SOW AGEAN FINAL fully executed 122118	NAT-AR-00702585-NAT-AR-00702589	R, 403, C		
PTX-0372	Natera - H3B MTExecuted071718	NAT-AR-00704025-NAT-AR-00704037	R, 403, C		
PTX-0373	MeRmaiD strategy sheet v2.eml	NAT-AR-00271185	R, 403, A, C, H, LK		
PTX-0374	Natera Novartis SOW1	NAT-AR-00702593-NAT-AR-00702614	R, 403, A, C, H, LK		
PTX-0375	MEDI MERMAID Strategy Sheet v2.xlsx	NAT-AR-00271186	R, 403, A, C, H, LK		
PTX-0376	Epizyme Natera SOW #2 April 15 2019.docx	NAT-AR-00704069-NAT-AR-00704071	R, 403, A, C, H, LK		
PTX-0377	Natera Genocoea SOW #2 April 17, 2019 .docx	NAT-AR-00704072-NAT-AR-00704074	R, 403, A, C, H, LK		
PTX-0378	FMI Product-Pilot_05DEC2018.docx	NAT-AR-00170892-NAT-AR-00170894	R, 403, A, C, H, LK		
PTX-0379	Intentionally Left Blank				
PTX-0380	Coombes personalized detection of ctDNA antedates breast cancer metastatic recurrence_CCR 2019	NAT-AR-00270192-NAT-AR-00270201	R, 403, A, C, H, LK		
PTX-0381	Reinert ctDNA ultra-deep sequencing in stage I to III CRC JAMA Onc 2019	NAT-AR-00270184-NAT-AR-00270191	R, 403, A, C, H, LK		
PTX-0382	Christensen early detection of MIBC metastatic relapse by ultra-deep sequencing of ctDNA JCO 2019	NAT-AR-00270172-NAT-AR-00270183	R, 403, A, C, H, LK		
PTX-0383	scan khoffman 2019-05-30-09-24-44	NAT-AR-00704088-NAT-AR-00704091	R, 403, C, DE		
PTX-0384	FMI-Based Natera Assay RUO-IUO Verification Protocol TPR-10154.03	NAT-AR-00168815-NAT-AR-00168839	R, 403, A, C, H, LK		
PTX-0385	FMI-Based Natera Assay (RUO/IUO) Risk Management Plan RMP-10030.02	NAT-AR-00663613-NAT-AR-00663626	R, 403, A, C, H, LK		
PTX-0386	FMI Plasma Pooling and Normalization and DNA Association TPR-10158.01	NAT-AR-00627421-NAT-AR-00627426	R, 403, A, C, H, LK		
PTX-0387	FMI-Based Natera Assay (RUO/IUO) Design and Development Plan DDP-10017.01	NAT-AR-00663627-NAT-AR-00663658	R, 403, A, C, H, LK		
PTX-0388	Product Specifications Signatera Cloud PSD-10034.07	NAT-AR-00144835-NAT-AR-00145197	R, 403, A, C, H, LK		
PTX-0389	2018-08-15 Natera and Fox Chase Cancer Center to Collaborate on Kidney Cancer Study	NAT-AR-00109442-NAT-AR-00109443	R, 403, A, C, H, IO, LK		
PTX-0390	2018-06-19 Natera and Institut Jules Bordet Announce Collaboration in Neoadjuvant Breast Cancer	NAT-AR-00109464-NAT-AR-00109465	R, 403, A, C, H, IO, LK		
PTX-0391	2020-01-06 Natera Announces Achievement of 55 Million In Pharma Contracts and Issuance of New Oncology Patents	NAT-AR-00110404-NAT-AR-00110405	R, 403, A, C, H, IO, LK		
PTX-0392	2017-09-20 Natera Selected for Circulating Tumor DNA Study in Bladder Cancer	NAT-AR-00110407-NAT-AR-00110408	R, 403, A, C, H, IO, LK		
PTX-0393	2020-09-03 Natera Receives Final Medicare Coverage for its Signatera MRD Test in Stage II-III Colorectal Cancer	NAT-AR-00110500-NAT-AR-00110501	R, 403, A, C, H, LK		
PTX-0394	2020-09-14 Natera Launches Initiative to Transform the Management of Cancer Patients in Organ Transplantation	NAT-AR-00110563-NAT-AR-00110564	R, 403, A, C, H, IO, LK		
PTX-0395	2019-09-25 Foundation Medicine and Natera Partner to Advance Personalized Cancer Monitoring	NAT-AR-00110798-NAT-AR-00110799	R, 403, A, C, H, IO, LK		
PTX-0396	2020-05-08 Natera 8k	NAT-AR-00110920-NAT-AR-00110922	R, 403, A, BE, C, H, LK		
PTX-0397	2019-03-11 Natera and BGI Genomics Announce 50M Partnership to Commercialize Signatera Oncology Test in China and to Develop Reproductive Health Tests in Select Markets on BG	NAT-AR-00110984-NAT-AR-00110986	R, 403, A, BE, C, H, LK		
PTX-0398	2017-11-01 Natera Chosen for Longitudinal Circulating Tumor DNA Study in Breast Cancer	NAT-AR-00111368-NAT-AR-00111369	R, 403, A, C, H, LK		
PTX-0399	2019-05-06 FDA Grants Breakthrough Device Designation to Natera's Signatera Test	NAT-AR-00111917-NAT-AR-00111918	R, 403, A, C, H, IO, LK		
PTX-0400	2020-10-02 Natera Announces Prospective Randomized Clinical Trial to Evaluate Palbociclib in Early Stage Breast Cancer Patients Who Test Positive with Signatera	NAT-AR-00111943-NAT-AR-00111944	R, 403, A, C, H, LK		
PTX-0401	2020-06-30 Natera 10Q	NAT-AR-00113795-NAT-AR-00113900	R, 403, A, C, H, LK		
PTX-0402	2020-11-05 Natera 8K	NAT-AR-00114408-NAT-AR-00114433	R, 403, A, C, H, LK		
PTX-0403	2020-11-17 Natera 8K	NAT-AR-00114538-NAT-AR-00114542	R, 403, A, C, H, LK		
PTX-0404	2017-12-31 Natera 10K	NAT-AR-00114800-NAT-AR-00114941	R, 403, A, C, H, IO, LK		
PTX-0405	2019-12-31 Natera 10K	NAT-AR-00114943-NAT-AR-00115094	R, 403, A, C, H, IO, LK		
PTX-0406	2019-09-30 Natera 10Q	NAT-AR-00115557-NAT-AR-00115670	R, 403, A, C, H, LK		
PTX-0407	2020-02-26 Natera 8K	NAT-AR-00115674-NAT-AR-00115701	R, 403, A, C, H, IO, LK		
PTX-0408	2020-08-05 Natera 8K	NAT-AR-00116227-NAT-AR-00116255	R, 403, A, C, H, LK		
PTX-0409	2020-05-06 Natera 8K	NAT-AR-00116900-NAT-AR-00116925	R, 403, A, C, H, IO, LK		
PTX-0410	License Agreement between Natera and Clariant Diagnostics Services	NAT-AR-00701953-NAT-AR-00701973	R, 403, A, C, H, LK		
PTX-0411	2018-03-09 Execution Copy License, Development and Distribution Agreement between Qiagen and Natera	NAT-AR-00363988-NAT-AR-00364050	R, 403, C		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0412	2017-07-28 ctDNA Head of Terms Principles vF	NAT-AR-00704161-NAT-AR-00704168	R, 403, C		
PTX-0413	2020-05-18 Sixth Amendment to Supply Agreement between Illumina and Natera	NAT-AR-00202660-NAT-AR-00202669	R, 403, C		
PTX-0414	Statement of Work – AstraZeneca Signatera Tissue Pilot with Natera	NAT-AR-00169203-NAT-AR-00169220	R, 403, A, C, H, LK		
PTX-0415	2020-08-07 Exhibit A Statement of Work Project No. 1 Preparations of Analytical Validation between AstraZeneca and Natera	NAT-AR-00169302-NAT-AR-00169312	R, 403, A, C, H, LK		
PTX-0416	2021-02-25 SVBLEERINK Natera Company Report	NAT-AR-00169167-NAT-AR-00169180	R, 403, A, C, H, LK		
PTX-0417	2021-02-25 Baird Natera Company Report	NAT-AR-00169146-NAT-AR-00169155	R, 403, A, C, H, LK		
PTX-0418	2021-02-26 BTIG Natera Company Report	NAT-AR-00169463-NAT-AR-00169475	R, 403, A, C, H, LK		
PTX-0419	2021-02-26 Craig-Hallum Natera Company Report	NAT-AR-00169509-NAT-AR-00169513	R, 403, A, C, H, LK		
PTX-0420	2021-02-26 Canaccord Genuity Natera Company Report	NAT-AR-00169181-NAT-AR-00169190	R, 403, A, C, H, LK		
PTX-0421	2021-02-25 Piper Sandler Natera Company Report	NAT-AR-00204896-NAT-AR-00204900	R, 403, A, C, H, LK		
PTX-0422	Spreadsheet: 2021-03-01 Signatera Financials WME v3	NAT-AR-00265269	R, 403, A, C, H, LK		
PTX-0423	2010-01-15 Email from Young to Medina re 2010_0108_exp324_SEQ MDA and Genomic Cystic Fibrosis Samples with Primer 3381	NAT-AR-00437935-NAT-AR-00437936	R, 403, A, C, H, LK		
PTX-0424	2010-08-24 Email from Banjevic to Ryan re intensity distributions in affy data	NAT-AR-00570455	R, 403, A, C, H, LK		
PTX-0425	2010-08-23 Email from Ryan to Banjevic re intensity distributions in affy data	NAT-AR-00570452	R, 403, A, C, CU, H, LK		
PTX-0426	Affy target intensity percentiles	NAT-AR-00570454	R, 403, A, C, H, LK		
PTX-0427	Cyto12 target intensity percentiles	NAT-AR-00570453	R, 403, A, C, H, LK		
PTX-0428	2013-12-09 Email from Wong to Hunkapiller re Mispriming Repetitive Sequence File in Primer3	NAT-AR-00417770	R, 403, A, C, H, LK		
PTX-0429	2011-10-19 Email from Gemelos to Banjevic re Summary of current plasma results	NAT-AR-00330037-NAT-AR-00330038	R, 403, A, C, H, LK		
PTX-0430	2014-04-22 Email from Digital PCR Conference to Gemelos re Preliminary Agenda Now Available - Jason Bielas, Ph.D., of FHCRC to Keynote	NAT-AR-00329648-NAT-AR-00329650	R, 403, A, C, H, LK		
PTX-0431	2010-05-11 Email from Gemelos to Banjevic re question	NAT-AR-00330622	R, 403, A, C, H, LK		
PTX-0432	2014-10-06 Email from Swenerton to Wong re Primer3 stuff	NAT-AR-00418445	R, 403, A, C, H, LK		
PTX-0433	2011-05-23 Email from Ryan to Banjevic re connecting to snp database	NAT-AR-00571086	R, 403, A, C, H, LK		
PTX-0434	Breast Cancer Panel: Mutation Selection and Primer Design	NAT-AR-00341221-NAT-AR-00341245	R, 403, A, C, DU, H, LK		
PTX-0435	2011-10-18 Email from Gemelos to Banjevic re Simulation	NAT-AR-00330176	R, 403, A, C, H, LK		
PTX-0436	2010-04-03 Email from Clark to Banjevic re 1M arrays reference data	NAT-AR-00570294-NAT-AR-00570295	R, 403, A, C, H, LK		
PTX-0437	2011-01-19 Email from Gemelos to Ryan re per our conversation about the ambry samples	NAT-AR-00437795-NAT-AR-00437796	R, 403, A, C, H, LK		
PTX-0438	2011-03-22 Email from Banjevic to Gemelos re stats for new data	NAT-AR-00330685-NAT-AR-00330686	R, 403, A, BE, C, CU, H, LK		
PTX-0439	2011-01-30 Email from Banjevic to Ryan re data spec, another attempt	NAT-AR-00335237-NAT-AR-00335240	R, 403, A, C, H, LK		
PTX-0440	2011-01-05 Email from Banjevic to Ryan re result set for you to look at	NAT-AR-00335505-NAT-AR-00335506	R, 403, A, BE, C, H, LK		
PTX-0441	2014-04-11 Email from Zimmermann to Sakarya re outer primer order for breast cancer mutation set	NAT-AR-00517410	R, 403, A, C, H, LK		
PTX-0442	2011-03-28 Email from Banjevic to Gemelos re stats for new data	NAT-AR-00330027-NAT-AR-00330030	R, 403, A, BE, C, CU, H, LK		
PTX-0443	2011-04-04 Email from Banjevic to Gemelos re FYI	NAT-AR-00329830-NAT-AR-00329832	R, 403, A, BE, C, H, LK		
PTX-0444	2011-03-17 Email from Baner to Ryan re barcode info for sequences	NAT-AR-00482574	R, 403, A, C, H, LK		
PTX-0445	2011-03-22 Email from Gemelos to Banjevic re stats for new data	NAT-AR-00330697-NAT-AR-00330698	R, 403, A, BE, C, H, LK		
PTX-0446	2011-01-31 Email from Gemelos to Banjevic re latest results for 200 snps.	NAT-AR-00330443	R, 403, A, C, H, LK		
PTX-0447	2011-03-17 Email from Ryan to Zimmermann re barcoding in recent experiment	NAT-AR-00482524	R, 403, A, C, H, LK		
PTX-0448	2010-07-14 Email from Sheena to Medina re follow up on 1M arrays	NAT-AR-00570376-NAT-AR-00570378	R, 403, A, C, H, LK		
PTX-0449	2010-07-16 Email from Ryan to Banjevic re estimated timeline	NAT-AR-00570379	R, 403, A, C, H, LK		
PTX-0450	2010-10-05 Email from Ryan to Banjevic re proposed analysis for GSN samples on affy snp6.0 array	NAT-AR-00570461-NAT-AR-00570462	R, 403, A, C, H, LK		
PTX-0451	2011-08-16 Email from Gemelos to Banjevic re 800-plex	NAT-AR-00329679	R, 403, A, C, CU, H, LK		
PTX-0452	2011-08-18 Email from Banjevic to Gemelos re 800-plex	NAT-AR-00329796-NAT-AR-00329797	R, 403, A, C, H, LK		
PTX-0453	2011-08-16 Email from Gemelos to Banjevic re 800-plex	NAT-AR-00329798-NAT-AR-00329799	R, 403, A, C, CU, H, LK		
PTX-0454	2011-08-15 Email from Ryan to Banjevic re 800-plex plasma samples	NAT-AR-00482523	R, 403, A, C, H, LK		
PTX-0455	2011-12-08 Email from Ryan to Gemelos re NIPD counting method estimated time line	NAT-AR-00436664	R, 403, A, C, H, LK		
PTX-0456	2011-06-01 Email from Ryan to Banjevic re inconsistency in sim results	NAT-AR-00335206	R, 403, A, BE, C, H, LK		
PTX-0457	2014-01-30 Email from Sakarya to Babiarz re barcode papers	NAT-AR-00634698-NAT-AR-00634700	R, 403, A, C, H, LK		
PTX-0458	2012-05-31 Email from Dodd to Lacroute re Columns for inclusion in primer design output file	NAT-AR-00483491	R, 403, A, C, H, LK		
PTX-0459	2012-09-26 Email from Ku to n-engineering re SequencingBarcode	NAT-AR-00489358	R, 403, A, BE, C, H, LK		
PTX-0460	Natera Deliver the Conceivable January 2014 Presentation	NAT-AR-00508552-NAT-AR-00508583	R, 403, A, C, H, IO, LK		
PTX-0461	2013-04-08 NIPT Microdeletion Project Primer Pool Design	NAT-AR-00325189-NAT-AR-00325206	R, 403, A, C, H, LK		
PTX-0462	npt primer quality.csv	NAT-AR-00417879-NAT-AR-00418443	R, 403, A, C, H, LK		
PTX-0463	2014-03-28 Haplotyping Assays Presentation	NAT-AR-00417672-NAT-AR-00417687	R, 403, A, C, H, LK		
PTX-0464	2014-01-31 Email from Sakarya to Akan re TagGD Question	NAT-AR-00666414-NAT-AR-00666416	R, 403, A, C, H, LK		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0465	2011-01-07 Email from Banjevic to Ryan re simming random mixtures	NAT-AR-00357585-NAT-AR-00357586	R, 403, A, BE, C, H, LK		
PTX-0466	2011-05-30 Result graph from 400 SNP analysis	NAT-AR-00330456	R, 403, A, C, H, LK		
PTX-0467	Spreadsheet: minipcr snps	NAT-AR-00599356	R, 403, A, C, H, LK		
PTX-0468	Cancer Data - breast cancer Presentation	NAT-AR-00482512	R, 403, A, BE, C, H, LK		
PTX-0469	Spreadsheet: minipcr snps2	NAT-AR-00330777	R, 403, A, C, H, LK		
PTX-0470	Spreadsheet: 2011-07-21 sim results	NAT-AR-00330178	R, 403, A, C, H, LK		
PTX-0471	2012-10-26 Email from Ryan to Eser re counting nipd writeup	NAT-AR-00324611	R, 403, A, C, H, LK		
PTX-0472	2014 Liquid Biopsy Product Concepts Presentation	NAT-AR-00522913-NAT-AR-00522943	R, 403, A, C, H, IO, LK		
PTX-0473	2013-11-05 Email from Hunkapiller to Best re Primer Quality Analysis	NAT-AR-00325227-NAT-AR-00325228	R, 403, A, C, H, LK		
PTX-0474	2012-12-17 Email from Ryan to Sigurjonsson re mapping writeup	NAT-AR-00324623	R, 403, A, C, H, LK		
PTX-0475	2011-08-12 Email from Banjevic to Gemelos enclosing silde sug Presentation	NAT-AR-00532141	R, 403, A, C, H, LK		
PTX-0476	PCR Protocol Model Presentation	NAT-AR-00532142-NAT-AR-00532146	R, 403, A, C, CU, H, LK		
PTX-0477	CNAPS VIII General Comments on the Meeting	NAT-AR-00583429-NAT-AR-00583441	R, 403, A, C, H, IO, LK		
PTX-0478	2014-12-12 Email from Constantin to Hoang re transplant feasibility plan updated	NAT-AR-00327937	R, 403, A, C, H, LK		
PTX-0479	2013-05-15 Email from Hunkapiller to Lacroute re Project Plan Episode IV	NAT-AR-00337388-NAT-AR-00337391	R, 403, A, C, H, LK		
PTX-0480	2011-08-12 Email from Banjevic to Gemelos re how about this	NAT-AR-00532135	R, 403, A, C, H, LK		
PTX-0481	PCR Protocol Model Presentation	NAT-AR-00532136-NAT-AR-00532140	R, 403, A, C, CU, H, LK		
PTX-0482	Spreadsheet: minipcr snps2	NAT-AR-00335516	R, 403, A, C, H, LK		
PTX-0483	Consistent Bias Modeling: 53plex Presentation	NAT-AR-00351459-NAT-AR-00351462	R, 403, A, C, H, LK		
PTX-0484	NIPT Primer Design Analysis Presentation	NAT-AR-00328806-NAT-AR-00328835	R, 403, A, C, H, LK		
PTX-0485	2012-09-10 Email from Dodd to Lacroute re Images	NAT-AR-00589805	R, 403, A, C, H, LK		
PTX-0486	September 2012 Natera DNA Sequence Analysis and Applications, orWhat the Heck is a 20,000-plex? Presentation	NAT-AR-00589806-NAT-AR-00589838	R, 403, A, C, H, LK		
PTX-0487	2014-09-04 Natera Oncology Overview Presentation	NAT-AR-00632787-NAT-AR-00632811	R, 403, A, C, H, LK		
PTX-0488	2011-04-16 Result Plot from SNP analysis	NAT-AR-00330646-NAT-AR-00330649	R, 403, A, C, H, LK		
PTX-0489	2012-07-10 Email from Banjevic to Sigurjonsson re p4bias docs	NAT-AR-00482531	R, 403, A, C, H, LK		
PTX-0490	2014-10-20 Email from Zimmermann to Babiarz re TP53 targets for tiling	NAT-AR-00509279-NAT-AR-00509283	R, 403, A, C, H, LK		
PTX-0491	Draft TP53 Tiling Assay Design	NAT-AR-00509284-NAT-AR-00509287	R, 403, A, C, H, LK		
PTX-0492	2011-04-18 Email from Banjevic to Gemelos re slides	NAT-AR-00532115	R, 403, A, C, H, LK		
PTX-0493	Sure Select Data: Info Presentation	NAT-AR-00532116-NAT-AR-00532121	R, 403, A, C, H, LK		
PTX-0494	Spreadsheet of SNP analysis	NAT-AR-00532124	R, 403, A, C, H, LK		
PTX-0495	Spreadsheet of SNP analysis	NAT-AR-00532122	R, 403, A, C, H, LK		
PTX-0496	Spreadsheet of SNP analysis	NAT-AR-00532123	R, 403, A, C, H, LK		
PTX-0497	2011-05-31 Email from Dodd to Zimmermann re Lower TM primer designs	NAT-AR-00589372	R, 403, A, BE, C, H, LK		
PTX-0498	2012-06-15 Email from Dodd to Hill re Primer design pool order forms	NAT-AR-00483526	R, 403, A, C, H, LK		
PTX-0499	poolC.csv	NAT-AR-00483527-NAT-AR-00483809	R, 403, A, C, H, LK		
PTX-0500	Ex. A-8 - SantaLucia, John (1997) A unified view of polymer, dumbbell, and oligonucleotide DNA nearest-neighbor thermodynamics, Proc. Natl. Acad. Sci. USA Vol. 95	NAT-AR-00329328-NAT-AR-00329334	R, 403, A, C, H, LK		
PTX-0501	Ex. A-12 - primer3 release 2.3.6 manual	NAT-AR-00329080-NAT-AR-00329123	R, 403, A, C, H, LK		
PTX-0502	Ex. A-11 - primer3 release 2.2.3 manual	NAT-AR-00329023-NAT-AR-00329079	R, 403, A, C, H, LK		
PTX-0503	Ex. A-14 - Koressaar, Triinu (2007) Enhancements and modifications of primer design program Primer3, Bioinformatics Applications Note Vol. 23	NAT-AR-00329127-NAT-AR-00329130	R, 403, A, C, H, LK		
PTX-0504	2015-05-29 ArcherDX Launches VariantPlex Product Line for DNA-based Targeted Sequencing, businesswire	NAT-AR-00805774	R, 403, A, C, H, LK		
PTX-0505	National Cancer Institute Website, Companion Diagnostic Test	NAT-AR-00806077	R, 403, A, C, H, LK		
PTX-0506	2020-08-04 ArcherMET Press Release: The Commercial Launch of the first METex 14 skipping test Archer®MET in Japan	NAT-AR-00805869-NAT-AR-00805870	R, 403, A, C, H, LK		
PTX-0507	Successful precision medicine will require more accurate genome sequencing	NAT-AR-00806051	R, 403, A, C, H, LK		
PTX-0508	2016-07-15 Principles for Codevelopment-In Vitro-Therapeutic Product	NAT-AR-00805779-NAT-AR-00805826	R, 403, A, C, H, LK		
PTX-0509	Laboratory-developed Tests (LDTs), Lab Tests Online	NAT-AR-00805885	R, 403, A, C, H, LK		
PTX-0510	2020-05-26 AstraZeneca collaborates with ArcherDX to use personalized cancer assays to detect minimal residual disease in lung cancer trial	NAT-AR-00805867	R, 403, A, C, H, LK		
PTX-0511	Scientists Can Make Copies of a Gene through PCR, Nature Education	NAT-AR-00806067	R, 403, A, C, H, LK		
PTX-0512	Laboratory Developed Tests, U.S. Food & Drug	NAT-AR-00805853	R, 403, A, C, H, LK		
PTX-0513	2016-11-14 ArcherDX Release: Anchored Multiplex PCR Patent Is Issued To Investors At Massachusetts General Hospital, BioSpace	NAT-AR-00805828	R, 403, A, C, H, IO, LK		
PTX-0514	LDT and CLIA FAQs	NAT-AR-00805770-NAT-AR-00805772	R, 403, A, C, H, LK		
PTX-0515	ArcherDX - New Horizons in Cancer Monitoring Flyer	NAT-AR-00805871	R, 403, A, C, H, LK		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0516	Invitae Key Features Webpage	NAT-AR-00806048	R, 403, A, C, H, LK		
PTX-0517	2015-06-04 ArcherDX Launches FusionPlex Lung Thyroid and FusionPlex Solid Tumor Panels, businesswire	NAT-AR-00805775	R, 403, A, C, H, LK		
PTX-0518	2020-09-24 Medicare Issues Draft Local Coverage Determination for Signatera in Immunotherapy Response Monitoring, Natera	NAT-AR-00805878	R, 403, A, C, H, LK		
PTX-0519	Local Coverage Determination (LCD) Process Modernization Qs & As	NAT-AR-00805872-NAT-AR-00805876	R, 403, A, C, H, LK		
PTX-0520	Biopsy: Types of biopsy procedures used to diagnose cancer, Mayo Clinic	NAT-AR-00805862	R, 403, A, C, H, LK		
PTX-0521	Invitae FusionPlex Key Features Webpage	NAT-AR-00806045	R, 403, A, C, H, LK		
PTX-0522	2019-09-09, Celcuity Announces Appointment of Eric Lindquist as Chief Business Officer, businesswire	NAT-AR-00805855	R, 403, A, C, H, LK		
PTX-0523	2021-03-24 FDA Grants Two New Breakthrough Device Designations for Natera's Signatera MRD Test, Natera	NAT-AR-00805886	R, 403, A, C, H, LK		
PTX-0524	Clinical Laboratory Improvement Amendments (CLIA), U.D. Food & Drug	NAT-AR-00805863	R, 403, A, C, H, LK		
PTX-0525	Natera Blood Draw Webpage	NAT-AR-00806074	R, 403, A, C, H, LK		
PTX-0526	Overview of IVD Regulations, U.S. Food & Drug	NAT-AR-00805856	R, 403, A, C, H, LK		
PTX-0527	2020-06-22 Press Release: Invitae and ArcherDX to create a global leader in comprehensive cancer genetics and prevision oncology, Invitae	NAT-AR-00805868	R, 403, A, C, H, LK		
PTX-0528	Invitae FusionPlex Key Features Webpage	NAT-AR-00806046	R, 403, A, C, H, LK		
PTX-0529	2019-09-24 Foundation Medicine and Natera Partner to Advance Personalized Cancer Monitoring, businesswire	NAT-AR-00805859	R, 403, A, C, H, LK		
PTX-0530	The science behind innovations in personalised cancer care: spotlight on comprehensive genomic profiling, Roche	NAT-AR-00806072	R, 403, A, C, H, LK		
PTX-0531	2020-10-05 Press Release: Invitae Completes Transaction with ArcherDX to Bring Comprehensive Cancer Genetics and Prevision Oncology to Patients Worldwide, Invitae	NAT-AR-00805880	R, 403, A, C, H, LK		
PTX-0532	National Cancer Institute Website, liquid biopsy	NAT-AR-00806070	R, 403, A, C, H, LK		
PTX-0533	2020-01-14 ArcherDX Personalized Cancer Monitoring (PCM) Technology Designated by FDA as Breakthrough Device, Cision PR Newswire	NAT-AR-00805861	R, 403, A, C, H, LK		
PTX-0534	Integrated DNA Technologies Website, Next Generation Sequencing (NGS)	NAT-AR-00806069	R, 403, A, C, H, LK		
PTX-0535	Natera Overview Webpage	NAT-AR-00806041	R, 403, A, C, H, IO, LK		
PTX-0536	2017-02-01 What is Cell-Free DNA (cfDNA)? - Seq It Out #19, ThermoFisher Scientific	NAT-AR-00806071	R, 403, A, BE, C, H, LK		
PTX-0537	US IPO Guide Latham & Watkins LLP 2021 Edition	NAT-AR-00805888-NAT-AR-00806039	R, 403, A, C, H, LK		
PTX-0538	Natera "When is Signatera used?" Webpage	NAT-AR-00806052	R, 403, A, C, H, IO, LK		
PTX-0539	Britannica Webpage, DNA sequencing	NAT-AR-00805769	R, 403, A, C, H, LK		
PTX-0540	National Human Genome Research Institute, DNA sequencing	NAT-AR-00806065	R, 403, A, C, H, LK		
PTX-0541	Invitae Key Features Webpage	NAT-AR-00806049	R, 403, A, C, H, LK		
PTX-0542	Natera Company Fact Sheet	NAT-AR-00806053-NAT-AR-00806062	R, 403, A, C, H, IO, LK		
PTX-0543	Natera "DNA testing" Webpage	NAT-AR-00806063	R, 403, A, C, H, IO, LK		
PTX-0544	2020-10-05 Invitae Completes Transaction with ArcherDX to Bring Comprehensive Cancer Genetics and Precision Oncology to Patients Worldwide, Cision PR Newswire	NAT-AR-00805881	R, 403, A, C, H, LK		
PTX-0545	Archer LiquidPlex Webpage	NAT-AR-00806043	R, 403, A, C, H, LK		
PTX-0546	2020-01-06 Natera Announces Achievement of 55 Million In Pharma Contracts and Issuance of New Oncology Patents	NAT-AR-00805860	R, 403, A, C, H, IO, LK		
PTX-0547	Rocky Mountain Cancer Centers "Adjuvant and Neoadjuvant Chemotherapy" Webpage	NAT-AR-00806075	R, 403, A, C, H, LK		
PTX-0548	Invitae LiquidPlex Key Features Webpage	NAT-AR-00806042	R, 403, A, C, H, LK		
PTX-0549	Integrated DNA Technologies Webpage, Overview	NAT-AR-00806066	R, 403, A, C, H, LK		
PTX-0550	Longwood Diagnostics LiquidPlex ctDNA 28 Webpage	NAT-AR-00806044	R, 403, A, C, H, LK		
PTX-0551	2021-04-08 How a Simple Blood Test Could Reduce Cancer Deaths, Barron's	NAT-AR-00805887	R, 403, A, BE, C, H, LK		
PTX-0552	Washington University Department of Surgery Public Health Sciences Division, Cancer Care Continuum	NAT-AR-00806073	R, 403, A, C, H, LK		
PTX-0553	Bloomberg website, ArcherDX Inc.	NAT-AR-00806064	R, 403, A, C, H, LK		
PTX-0554	2020-03-25 Japanese Regulators Approve Merck KGaA MET Inhibitor With ArcherDx CDx, Precision Oncology News	NAT-AR-00805866	R, 403, A, C, BE, H, LK		
PTX-0555	Promega PCR Amplification, Introduction to PCR Webpage	NAT-AR-00806068	R, 403, A, C, H, LK		
PTX-0556	NCBI, Polymerase Chain Reaction (PCR) Webpage	NAT-AR-00805829	R, 403, A, C, H, LK		
PTX-0557	Foundation Medicine Press Companion Diagnostics Webpage	NAT-AR-00806040	R, 403, A, C, H, LK		
PTX-0558	2020-03-13 The ABCs of Reimbursement for Breakthrough Devices, Lincotek Medical	NAT-AR-00805864	R, 403, A, C, H, LK		
PTX-0559	Commercial Laboratory Tests and FDA Approval, Lab Tests Online	NAT-AR-00805883	R, 403, A, C, H, LK		
PTX-0560	2019-12-17 ArcherDX Announces Close of \$55 Million Series C Financing	NAT-AR-00803315-NAT-AR-00803316	R, 403, A, C, H, LK		
PTX-0561	2019-01-10 ArcherDX and Illumina Partner for Future to Co-Marketing Portfolio of Planned In-vitro Diagnostics (IVD) Tests	NAT-AR-00803308-NAT-AR-00803309	R, 403, A, C, H, LK		
PTX-0562	Archer DX Website: 2020-07-28 Archer Solid Tumor Research Products	NAT-AR-00803345-NAT-AR-00803350	R, 403, A, C, H, LK		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0563	Journal of Molecular Diagnostics, Cheng, J. 21-4 (July 2019) "Clinical Validation of a Cell-Free DNA Gene Panel"	NAT-AR-00803382-NAT-AR-00803395	R, 403, A, C, H, LK		
PTX-0564	2020-01-14 PR -ArcherDX Article: "Personalized Cancer Monitoring (PCM) Technology Designated by FDA as Breakthrough Device"	NAT-AR-00803310-NAT-AR-00803311	R, 403, A, C, H, LK		
PTX-0565	2019-01-08 PR Newswire - ArcherDX's Companion Diagnostic Assay for both Liquid Biopsy and Tissue Specimens Granted Breakthrough Device Designation by U.S.Food and Drug Administration	NAT-AR-00803305-NAT-AR-00803307	R, 403, A, C, H, LK		
PTX-0566	Research Gate, (2003, June) "The Return on R&D Versus Capital Expenditures in Pharmaceutical and Chemical Industries"	NAT-AR-00804170-NAT-AR-00804180	R, 403, A, C, H, LK		
PTX-0567	JP Morgan Survey,(2021-06-03) Minimal Residual Disease Liquid Biopsy Survey: Implications for NTRA, GH, ILMN, NVTX & Others	NAT-AR-00804900-NAT-AR-00804934	R, 403, A, C, H, LK		
PTX-0568	Cowen Equity Research Article: 2021-02-16 GH Launches Guardant Reveal MRD (Lunar-1) Liquid Biopsy	NAT-AR-00805760-NAT-AR-00805764	R, 403, A, C, H, LK		
PTX-0569	Thomson Reuters Streetevents Transcript, 2019-08-07 NTRA Q2 2019 Natera Inc Earnings Call	NAT-AR-00803991-NAT-AR-00804005	R, 403, A, C, H, LK		
PTX-0570	Morgan Stanley Research Report:2021-01-14 "Sector Recap Following Management Updates - Part 3"	NAT-AR-00804839-NAT-AR-00804841	R, 403, A, C, H, LK		
PTX-0571	Evid Based Nurs Research Article: 2020-01 Vol. 23" What are Sensitivity and Specificity"	NAT-AR-00805609-NAT-AR-00805611	R, 403, A, C, H, LK		
PTX-0572	UCL IRIS Website, Dr. Chris Abbosh Profile	NAT-AR-00805188	R, 403, A, C, H, LK		
PTX-0573	Cision PR Newswire Article: 2021-06-03 "Invitae Opens Early Access to Liquid Biopsy-Based Personalized Cancer Monitoring as a Central Laboratory Service"	NAT-AR-00805725	R, 403, A, C, H, LK		
PTX-0574	Refinitiv Streetevents Transcript, 2021-08-03 NVTX.N - Q2 2021 Invitae Corp Earnings Call	NAT-AR-00805097-NAT-AR-00805110	R, 403, A, C, H, LK		
PTX-0575	Article: Perspectives in Clinical Research, Study designs Part 1 – An overview and classification	NAT-AR-00805756-NAT-AR-00805759	R, 403, A, C, H, LK		
PTX-0576	Natera website, 2020-04-15 "Natera Asserts Three New Oncology Patents Against ArcherDX"	NAT-AR-00805734	R, 403, A, C, H, IO, LK		
PTX-0577	JP Morgan Equity Research Report, (2021-06-25) Liquid Biopsy Deep Dive	NAT-AR-00804935-NAT-AR-00805004	R, 403, A, C, H, LK		
PTX-0578	Bloomberg website, Invitae Corp	NAT-AR-00805177	R, 403, A, C, H, LK		
PTX-0579	Natera website, 2021-03-10 "Natera and Genentech Initiate Phase III Trial Using Signatera™ as a Companion Diagnostic for Atezolizumab in Early-Stage Muscle-Invasive Bladder Cancer"	NAT-AR-00805180	R, 403, A, C, H, LK		
PTX-0580	BTIG Research Report, 2020-11-30 OncoCyt Corporation (OCX, Buy,\$5 PT)	NAT-AR-00804835-NAT-AR-00804838	R, 403, A, C, H, LK		
PTX-0581	SVB Leerink Earnings Report, 2021-05-05 "Invitae 1Q21 Volumes Beat, Guide Still Conservative As NVTX Integrates Archer"	NAT-AR-00804842-NAT-AR-00804848	R, 403, A, C, H, LK		
PTX-0582	ThermoFisher Scientific Website, "What is Next-Generation Sequencing (NGS)"	NAT-AR-00805184	R, 403, A, C, H, LK		
PTX-0583	Good Morning America Website, 2021-06-10 "Cutting-Edge Test Detects Early Tumor Recurrence in Some Cancers"	NAT-AR-00805716	R, 403, A, C, H, LK		
PTX-0584	Natera Press Release, (2020-08-26) "Natera's Signatera™ Test Receives CE Mark."	NAT-AR-00805735	R, 403, C, DU, H, LK		
PTX-0585	SVB Leerink Initiation Report, (2020-09-17) Natera Inc. Significant Ramp Ahead In Cancer Liquid Biopsy Adds to Leading NIPT Biz, PR \$75	NAT-AR-00804744-NAT-AR-00804834	R, 403, A, C, H, LK		
PTX-0586	Invitae Press Release, "Invitae Announces Collaboration with Maverick Therapeutics for use of RaDaRTM Assay	NAT-AR-00805721	R, 403, A, C, H, LK		
PTX-0587	Research Gate, 03-1982 Preemptive Patenting and the Persistence of Monopoly Power	NAT-AR-00803852-NAT-AR-00803866	R, 403, A, C, H, LK		
PTX-0588	Natera Website, "Natera Announces the Validation and Launch of the Prospera™ Heart Transplant Assessment Test"	NAT-AR-00805732	R, 403, A, C, H, LK		
PTX-0589	CMS.gov Article, "Billing and Coding ModDX Minimal Residual Disease Testing for Colorectal Cancer (A53330)	NAT-AR-00805739	R, 403, A, C, H, LK		
PTX-0590	BTIG Research Report 2021-03-30 Key Takeaways from our MRD Panels	NAT-AR-00805742-NAT-AR-00805755	R, 403, A, C, H, LK		
PTX-0591	2021-02-25 JP Morgan - Natera 4Q20 Recap: Solid Close to Standout Year w/21 Setup Increasingly Attractive on Enhanced Pipeline; Maintain OW, \$135 PT	NAT-AR-00804721-NAT-AR-00804731	R, 403, A, C, H, LK		
PTX-0592	Refinitiv Streetevents (2021-08-11) Event Transcript of Invitae Corp Conference Call	NAT-AR-00805111-NAT-AR-00805124	R, 403, A, C, H, LK		
PTX-0593	2020-09-25 Natera, Inc. v. ArcherDX, Inc. Consolidation Order C.A.No. 20-cv-01047-LPS	NAT-AR-00804449-NAT-AR-00804451	NP		
PTX-0594	Natera 10-Q (May 2021)	NAT-AR-00804849-NAT-AR-00804899	R, 403, A, C, H, LK		
PTX-0595	Financial Accounting Standards Board ("FASB"), "Revenue Recognition ASU 2014-09 Revenue from Contracts with Customers (Topic 606)"	NAT-AR-00805187	R, 403, A, C, H, LK		
PTX-0596	PMC Labs Website, 2021-01-19 "ctDNA and Adjuvant Therapy for Colorectal Cancer Time to Re-Invent Our Treatment Paradigm"	NAT-AR-00805618-NAT-AR-00805640	R, 403, A, C, H, LK		
PTX-0597	2021-08-11 Refinitiv Streetevents - NTRA.OQ – Natera Inc at Canaccord Genuity Growth Conference	NAT-AR-00805075-NAT-AR-00805082	R, 403, A, C, H, LK		
PTX-0598	Invitae Press Release, 2021-03-09 "FDA Grants Breakthrough Device Designation for Invitae's RaDaRTM Assay	NAT-AR-00805720	R, 403, A, C, H, LK		
PTX-0599	2019-09-11 Thomson Reuters Streetevents - NTRA – Natera Inc at Morgan Stanley Healthcare Conference	NAT-AR-00804006-NAT-AR-00804013	R, 403, A, C, H, LK		
PTX-0600	Invitae 8-K (2021)	NAT-AR-00804409-NAT-AR-00804411	R, 403, A, C, H, LK		
PTX-0601	Cision PR Newswire Article: 2021-04-05 Invitae to Acquire Genosity to Accelerate Access to Personalized Oncology Testing Worldwide	NAT-AR-00805726	R, 403, A, C, H, LK		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0602	2021-02-26 Morgan Stanley Research - "Time to Shine: A Robust Quarter, An Impressive Guide, An Expanded TAM and Multiple Drivers of Upside Yet to Come; Reiterate OW, Increase PT \$140"	NAT-AR-00804732-NAT-AR-00804743	R, 403, A, C, H, LK		
PTX-0603	Morningstar Article: 2021-01 "Liquid Biopsy Firms Creating a New Frontier in Cancer Screening and Treatment: Intangible Assets Rising in This Nascent Market"	NAT-AR-00805765-NAT-AR-00805768	R, 403, A, C, H, LK		
PTX-0604	2021-08-05 Refinitiv Streetevents - NTRA.OQ - Q2 2021 Natera Inc Earnings CaLI	NAT-AR-00805005-NAT-AR-00805017	R, 403, A, C, H, LK		
PTX-0605	Natera Website, 2021-06-18 "Natera Awarded Advanced Diagnostic Laboratory Test (ADLT) Status for its Signatera® MRD Test From CMS."	NAT-AR-00805182	R, 403, A, C, H, LK		
PTX-0606	Natera Website, (2019-09-25) "Foundation Medicine and Natera Partner to Advance Personalized Cancer Monitoring"	NAT-AR-00805186	R, 403, A, C, H, LK		
PTX-0607	ArcherDX Website, Research Products (2021)	NAT-AR-00805173	R, 403, A, C, DE, H, LK		
PTX-0608	European Economic Review (1983) "Preemption Leapfrogging and Competition in Patent Races"	NAT-AR-00803799-NAT-AR-00803827	R, 403, A, C, H, LK		
PTX-0609	GlobalData Publication - ArcherDx Inc (2021-04)	NAT-AR-00805642-NAT-AR-00805698	R, 403, A, C, H, IO, LK		
PTX-0610	FDA Website, 2018-12-07 Companion Diagnostics	NAT-AR-00805714	R, 403, A, C, H, LK		
PTX-0611	Molecular Diagnostic Program (MolDX®) Coverage, Coding, and Pricing Standards and Requirements (M00106)	NAT-AR-00804014-NAT-AR-00804028	R, 403, A, C, H, LK		
PTX-0612	2020-08-06 Natera Inc. v. ArcherDX, Inc., Complaint	NAT-AR-00804412-NAT-AR-00804448	R, 403, A, C, H, IO, LK, NP		
PTX-0613	Foundation Medicine Press Release, 2020-05-20 "Foundation Medicine Receives FDA Approval for FoundationOne®CDx as the Companion Diagnostic for LYNPARZA® to Identify Patients with HRR-Mutated Metastatic Castration-Resistant Prostate Cancer"	NAT-AR-00805741	R, 403, A, C, H, LK		
PTX-0614	Refinitiv Streetevents Edited Transcript, 2021-02-25 Q4 2020 Natera Inc Earnings Call	NAT-AR-00804469-NAT-AR-00804485	R, 403, A, C, H, LK		
PTX-0615	BioChain Institute Website, "What Is FFPE Tissue And What Are Its Uses"	NAT-AR-00805174	R, 403, A, C, H, LK		
PTX-0616	2019-02-14 BioPharmaDive, "AstraZeneca retires Medimmune name amid sales turnaround"	NAT-AR-00805175	R, 403, A, C, H, LK		
PTX-0617	ArcherDX Website, "Blood Cancer Research Tests"	NAT-AR-00805191	R, 403, A, C, H, LK		
PTX-0618	Biostatistics (2002) Journal Article: "Prospective Studies of Diagnostic Test Accuracy When Disease Prevalence is Low",	NAT-AR-00805572-NAT-AR-00805587	R, 403, A, C, H, LK		
PTX-0619	Journal of Economic Perspectives: Lemley, M. and Shapiro, C. (Spring 2005) "Probabilistic Patents"	NAT-AR-00805125-NAT-AR-00805164	R, 403, A, C, H, LK		
PTX-0620	Natera, Inc. Trust Securities Disclosure, 2021-01-27 "Initiate Coverage of NTRA with a Buy"	NAT-AR-00804452-NAT-AR-00804468	R, 403, A, C, H, IO, LK		
PTX-0621	2021-07-01 U.S. Patent and Trademark Office, "General Information Concerning Patents,"	NAT-AR-00805183	R, 403, A, C, H, LK		
PTX-0622	Medtech Breakthrough Awards Website, "2021 Winners"	NAT-AR-00805731	R, 403, A, C, H, LK		
PTX-0623	ECONOMETRICA Berry, S., Levinsohn, J., Pakes, A. (Jul, 1995) Vol 63, No. 4 "Automobile Prices in Market Equilibrium."	NAT-AR-00803867-NAT-AR-00803917	R, 403, A, C, H, LK		
PTX-0624	Natera 10-K (2017)	NAT-AR-00804029-NAT-AR-00804169	R, 403, A, C, H, IO, LK		
PTX-0625	Invitae 10-K (2020)	NAT-AR-00804181-NAT-AR-00804408	R, 403, A, C, H, LK		
PTX-0626	Natera Website, 2017-09-20 "Natera Selected for Circulating Tumor DNA Study in Bladder Cancer"	NAT-AR-00805736	R, 403, A, C, H, IO, LK		
PTX-0627	Medicine Study "Evidence Supporting FDA Approval and CMS National Coverage Determinations for Novel Medical Products", 2005 through 2016	NAT-AR-00803977-NAT-AR-00803984	R, 403, A, C, H, LK		
PTX-0628	LCD-MolDX Minimal Residual Disease Testing for Colorectal (L38305)	NAT-AR-00805165-NAT-AR-00805172	R, 403, A, C, H, LK		
PTX-0629	Refinitiv Streetevent - 2021-09-11 Edited Transcript of Invitae Corp at UBS Genomics 2.0 and MedTech Innovations Summit	NAT-AR-00805083-NAT-AR-00805096	R, 403, A, C, H, LK		
PTX-0630	Center for Medicare & Medicaid Services, MolDX Minimal Residual Disease Testing for Colorectal Cancer	NAT-AR-00805178	R, 403, A, C, H, LK		
PTX-0631	ArcherDX Website, "VariantPlex Comprehensive Thyroid & Lung"	NAT-AR-00805189	R, 403, A, C, H, LK		
PTX-0632	BD Press Release, 2017-04-26 "BD Licenses Novel Molecular Indexing Technology to Roche,"	NAT-AR-00805190	R, 403, A, C, H, LK		
PTX-0633	ResearchGate Website, February 1994 "First Mover Advantages From Pioneering New Markets: A Survey of Empirical Evidence"	NAT-AR-00803828-NAT-AR-00803851	R, 403, A, C, H, LK		
PTX-0634	Cornell Law Review: Issue 1 November 2013 Volume 99 "Patent Versus Noninfringement"	NAT-AR-00803918-NAT-AR-00803976	R, 403, A, BE, C, H, LK		
PTX-0635	Cancer Research UK Website, TRACERx	NAT-AR-00805176	R, 403, A, C, H, LK		
PTX-0636	British Journal of Cancer (2013) Article: "Overestimated Lead Times in Cancer Screening has led to Substantial Underestimation of Overdiagnosis"	NAT-AR-00803985-NAT-AR-00803990	R, 403, A, C, H, LK		
PTX-0637	FDA Website, 2018-12-17 "Companion Diagnostics"	NAT-AR-00805195	R, 403, A, C, H, LK		
PTX-0638	Natera Website, "Natera Releases New Clinical Data at ESMO 2021 in Gastroesophageal Cancer and Uveal Melanoma"	NAT-AR-00805738	R, 403, A, C, H, LK		
PTX-0639	Diaceutics Website, "Why are partnerships between pharma and diagnostic companies important"	NAT-AR-00805193	R, 403, A, C, H, LK		
PTX-0640	Integrated Sciences Website, "LiquidPlex"	NAT-AR-00805723	R, 403, A, C, H, LK		
PTX-0641	Guardant Website, "Helmy Eltoukhy, PhD Chief Executive Officer"	NAT-AR-00805718	R, 403, A, C, H, LK		
PTX-0642	Natera Website, "New Signatera™ Data in Multiple Myeloma, Colorectal Cancer and Ovarian Cancer Highlights Clinical Utility of MRD in Real-World Settings"	NAT-AR-00805709	R, 403, A, C, H, LK		
PTX-0643	National Cancer Institute Website, Companion Diagnostic Test	NAT-AR-00805708	R, 403, A, C, H, LK		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0644	Natera Website, 2021-09-07 Natera's Signatera® Test Selected for NRG Oncology's Landmark CIRCULATE-US Study of MRD-Guided Treatment in Stage II-III Colon Cancer	NAT-AR-00805594	R, 403, A, C, H, LK		
PTX-0645	Natera Website, 2020-01-15 National Cancer Center Japan Launches Multi-Center Randomized Trial Using Signatera™ MRD Testing in Stage II-III Colorectal Cancer	NAT-AR-00805596	R, 403, A, C, H, LK		
PTX-0646	Integrated DNA Technologies Website, NGS Workflow	NAT-AR-00805722	R, 403, A, C, H, LK		
PTX-0647	Natera Article: 2021-08-04 Announces Use of Signatera® as a Companion Diagnostic in GSK's Phase III ZEST Trial for Niraparib in Early-Stage Breast Cancer."	NAT-AR-00805733	R, 403, A, C, H, LK		
PTX-0648	Natera Website, Altera Tumor Profiling	NAT-AR-00805737	R, 403, A, C, H, IO, LK		
PTX-0649	FDA Website, 2021-09-13 Clinical Laboratory Improvement Amendments	NAT-AR-00805713	R, 403, A, C, H, LK		
PTX-0650	Invitae Website, Research Products, 2021	NAT-AR-00805727	R, 403, A, C, H, LK		
PTX-0651	Natera Article: 2021-07-22 New Publication Shows 96% Overall Survival Among Metastatic Colorectal Cancer Patients Who Test MRD-Negative with Signatera® After Surgery	NAT-AR-00805705	R, 403, A, C, H, LK		
PTX-0652	Natera Website, Leadership Team	NAT-AR-00805603	R, 403, A, C, H, LK		
PTX-0653	Guardant Health Website, Biopharma Solution	NAT-AR-00805717	R, 403, A, C, H, LK		
PTX-0654	Article: 202-06-16 Nature Journal Publishes Prospective, Randomized Study Validating Signatera® for Prediction of Immunotherapy Benefit	NAT-AR-00805597	R, 403, A, C, H, LK		
PTX-0655	Article: 202-04-28 ArcherDX and UCL Present New Minimal Residual Disease Surveillance Data from their Collaboration at 2020 AACR Virtual Annual Meeting	NAT-AR-00805740	R, 403, A, C, H, LK		
PTX-0656	Article: 2021-06-08 Foundation Medicine Launches FoundationOne Tracker ctDNA Monitoring Assay for Research Use in Partnership with Natera,"	NAT-AR-00805604	R, 403, A, C, H, LK		
PTX-0657	Noridian Healthcare Solutions Website, 2020-04-22 Molecular Disagnotic Services (MoIDX)	NAT-AR-00805699	R, 403, A, C, H, LK		
PTX-0658	Article: 2020-11-23 FDA Accepts Invitae Premarket Approval Submission for Stratafide Companion Diagnostic	NAT-AR-00805712	R, 403, A, C, H, LK		
PTX-0659	Invitae 10-K (2021)	NAT-AR-00804486-NAT-AR-00804720	R, 403, A, C, H, LK		
PTX-0660	QIAGEN Website, "QIaseq and Single Primer Extension Chemistry," 1292018	NAT-AR-00805700	R, 403, A, C, H, LK		
PTX-0661	Nature Website, Scientists Can Make Copies of a Gene Through PCR	NAT-AR-00805703	R, 403, A, C, H, LK		
PTX-0662	FDA Website, 2021-09-13 Clinical Laboratory Improvement Amendments	NAT-AR-00805194	R, 403, A, C, H, LK		
PTX-0663	Google Patents Website, U.S. Patent No. 9,708,659	NAT-AR-00805397-NAT-AR-00805451	R, 403, A, BE, C, H, LK		
PTX-0664	Article: 2017-04-26 MarketScreener, "Becton, Dickinson and Company Licenses Novel Molecular Indexing Technology to Roche	NAT-AR-00805730	R, 403, A, C, H, LK		
PTX-0665	Google Patents Website, U.S. Patent No. 9,290,809	NAT-AR-00805303-NAT-AR-00805353	R, 403, A, BE, C, H, LK		
PTX-0666	Article: Study in Nature Shows Early Relapse Detection in Lung Cancer Using Natera's Technology forctDNA Analysis	NAT-AR-00805601	R, 403, A, BE, C, H, LK		
PTX-0667	Article: New Study Validates the Signatera® MRD Test and Demonstrates its Clinical Utility in Early-Stage Esophageal Cancer	NAT-AR-00805710	R, 403, A, BE, C, H, LK		
PTX-0668	Google Patents Website, U.S. Patent No. 9,816,137	NAT-AR-00805452-NAT-AR-00805507	R, 403, A, BE, C, H, LK		
PTX-0669	Google Patents Website, U.S. Patent No. 9,845,502	NAT-AR-00805508-NAT-AR-00805562	R, 403, A, BE, C, H, LK		
PTX-0670	Google Patents Website, U.S. Patent No. 8,835,358	NAT-AR-00805198-NAT-AR-00805250	R, 403, A, BE, C, H, LK		
PTX-0671	Google Patents Website, U.S. Patent No. 9,290,808	NAT-AR-00805251-NAT-AR-00805302	R, 403, A, BE, C, H, LK		
PTX-0672	Google Patents Website, U.S. Patent No. 9,315,857	NAT-AR-00805354-NAT-AR-00805396	R, 403, A, BE, C, H, LK		
PTX-0673	Article: Liotta and Petricoin (2012) - Regulatory approval pathways for molecular diagnostic technology	NAT-AR-00806195	R, 403, A, C, H, LK		
PTX-0674	Article: Chambers et al. (2013) - Medicare Covers The Majority Of FDA-Approved Devices	NAT-AR-00806078-NAT-AR-00806084	R, 403, A, C, H, LK		
PTX-0675	Article: Sherry and Teece (2004) - Royalties evolving patent rights	NAT-AR-00806196-NAT-AR-00806208	R, 403, A, C, H, LK		
PTX-0676	Article: Lieberman and Montgomery (1988) - First-Mover Advantages	NAT-AR-00806176-NAT-AR-00806194	R, 403, A, C, H, LK		
PTX-0677	Article: Walker-Daniels, Jennifer (2012) - Current PCR Methods	NAT-AR-00806209-NAT-AR-00806220	R, 403, A, C, H, LK		
PTX-0678	2007-11-15 FASB - Statement of Financial Accounting Standards - Fair Value Measurements	NAT-AR-00806085-NAT-AR-00806175	R, 403, A, C, H, IL, LK		
PTX-0679	U.S. Patent No. 10,538,814 2021 PTO Filings	NAT-AR-00703067-NAT-AR-00703099			
PTX-0680	U.S. Patent No. 10,590,482 2021 PTO Filings	NAT-AR-00703133-NAT-AR-00703166			
PTX-0681	U.S. Patent No. 10,731,220 2021 PTO Filings	NAT-AR-00703167-NAT-AR-00703199			
PTX-0682	U.S. Patent No. 10,557,172 2021 PTO Filings	NAT-AR-00703100-NAT-AR-00703132			
PTX-0683	2021-07-22 New Publication Shows 96% Overall Survival Among Metastatic Colorectal Cancer Patients Who Test MRD-Negative with Signatera After Surgery, Tyler Morning Telegraph	NAT-AR-00703883-NAT-AR-00703885	R, 403, A, BE, C, H, IO, LK		
PTX-0684	U.S. Provisional Patent Application 61/571248	NAT-AR-00800565-NAT-AR-00800584	R, 403, A, C, H, LK		
PTX-0685	U.S. Provisional Patent Application 61/426208	NAT-AR-00800078-NAT-AR-00800129	R, 403, A, C, H, LK		
PTX-0686	U.S. Patent Application 15/269,448 - '810 patent	NAT-AR-00708365-NAT-AR-00708684	R, 403, A, C, H, LK		
PTX-0687	U.S. Patent Application 13/793,564 - '828 patent	NAT-AR-00708685-NAT-AR-00708976	R, 403, A, C, H, LK		
PTX-0688	Targ Seq Day5 May16	NAT-AR-00347496-NAT-AR-00347497	R, 403, A, C, H, LK		
PTX-0689	Gsn Nov11 Plasma	NAT-AR-00347437-NAT-AR-00347438	R, 403, A, C, H, LK		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0690	Gsn Nov14 Plasma	NAT-AR-00347439-NAT-AR-00347440	R, 403, A, C, H, LK		
PTX-0691	Gsn Per Sept13 Bz Plasma	NAT-AR-00347455-NAT-AR-00347469	R, 403, A, C, H, LK		
PTX-0692	Gsn Nov2 Plasma	NAT-AR-00347441-NAT-AR-00347443	R, 403, A, C, H, LK		
PTX-0693	Gsn All Plasma	NAT-AR-00347432-NAT-AR-00347434	R, 403, A, C, H, LK		
PTX-0694	Targ Seq Day5 Aug28	NAT-AR-00347494-NAT-AR-00347495	R, 403, A, C, H, LK		
PTX-0695	Gsn Per Aug1 Plasma	NAT-AR-00347446-NAT-AR-00347454	R, 403, A, C, H, LK		
PTX-0696	Targ Seq Day5 Sept30 Classifier	NAT-AR-00347500-NAT-AR-00347501	R, 403, A, C, H, LK		
PTX-0697	Targ Seq Day5 Sept13	NAT-AR-00347498	R, 403, A, C, H, LK		
PTX-0698	Gsn Oct18 Plasma	NAT-AR-00347444-NAT-AR-00347445	R, 403, A, C, H, LK		
PTX-0699	Targ Seq Day5 Sept30	NAT-AR-00347499	R, 403, A, C, H, LK		
PTX-0700	Gsn Per Sept30 Plasma	NAT-AR-00347470-NAT-AR-00347478	R, 403, A, C, H, LK		
PTX-0701	Mini Per Prod4 Data	NAT-AR-00347479-NAT-AR-00347493	R, 403, A, C, H, LK		
PTX-0702	Gsn Dec8 Plasma	NAT-AR-00347435-NAT-AR-00347436	R, 403, A, C, H, LK		
PTX-0703	Spreadsheet: 2021-08-25 Signatera Financials MWE	NAT-AR-00704157	R, 403, A, C, H, LK		
PTX-0704	U.S. Patent Publication 2012/0122701 (Ryan)	NAT-AR-00705718-NAT-AR-00705759	R, 403, A, C, H, LK		
PTX-0705	U.S. Patent Publication 2012/0270212 (Rabinowitz)	NAT-AR-00704258-NAT-AR-00704350	R, 403, A, C, H, LK		
PTX-0706	BPMHELP-1568 BEAST_space	NAT-AR-00621908-NAT-AR-00623581	R, 403, A, C, H, LK		
PTX-0707	2021-03-10 Natera and Genentech Initiate Phase III Trial Using Signatera as a Companion Diagnostic for Atexolizumab in Early-Stage Muscle-Invasive bladder Cancer, Cision PR Newswire	NAT-AR-00702352-NAT-AR-00702353	R, 403, A, C, H, LK		
PTX-0708	Signatera Z codes Presentation	NAT-AR-00703882	R, 403, A, C, H, LK		
PTX-0709	2021-02-26 Natera 10-K	NAT-AR-00702139-NAT-AR-00702286	R, 403, A, C, H, IO, LK		
PTX-0710	2019-03-08 Joint Patent Owners' Agreement between UCL Business PLC and Natera	NAT-AR-00702110-NAT-AR-00702119	R, 403, C		
PTX-0711	2015-06-17 Research Collaboration Agreement between Cancer Research UK and Natera	NAT-AR-00702098-NAT-AR-00702109	R, 403, A, C, H, LK		
PTX-0712	Oncology: Immunotherapy & Altera Launch Presentation	NAT-AR-00702287-NAT-AR-00702315	R, 403, A, C, H, LK		
PTX-0713	2020-01-14 Signatera Competition & Landscape Presentation	NAT-AR-00702631-NAT-AR-00702647	R, 403, A, C, H, LK		
PTX-0714	2020-04-09 Signatera Market Landscape Presentation	NAT-AR-00702657-NAT-AR-00702669	R, 403, A, C, H, LK		
PTX-0715	2021-01-07 Natera 2021 Kick Off Presentation	NAT-AR-00702670-NAT-AR-00702704	R, 403, A, C, H, LK		
PTX-0716	2021-02-25 Signatera Oncology LD alignment On-site Presentation	NAT-AR-00702705-NAT-AR-00702837	R, 403, A, C, H, LK		
PTX-0717	Good Morning America Video Clip re Natera Cancer Testing Breakthrough	NAT-AR-00702838	R, 403, A, C, H, LK		
PTX-0718	Archer FusionPlex® protocol for Ion Torrent LA250.1	NAT-AR-00702865-NAT-AR-00702885	R, 403, A, C, H, LK		
PTX-0719	2021-06-24 Natera and BGI Genomics Announce Commercial Launch of the BGI/Natera Signatera Assay in China	NAT-AR-00703056-NAT-AR-00703057	R, 403, A, C, H, LK		
PTX-0720	Natera Capacity and Expansion Update Operations Presentation	NAT-AR-00702908-NAT-AR-00702915	R, 403, A, C, H, LK		
PTX-0721	Signatera Flyer: A Personalized, Tumor-Informed Approach to Detect Molecular Residual Disease with High Sensitivity and Specificity	NAT-AR-00703059-NAT-AR-00703066	R, 403, A, C, H, LK		
PTX-0722	2021 Winners MedTech Breakthrough	NAT-AR-00703200-NAT-AR-00703222	R, 403, A, C, H, LK		
PTX-0723	2023-03-24 Natera Employee Communication: The Today Show re Signatera	NAT-AR-00827184	R, 403, A, C, H, LK		
PTX-0724	2022-03-28 Natera Listed as One of World's Most Innovative Health Companies by Fast Company, BioSpace	NAT-AR-00827185-NAT-AR-00827187	R, 403, A, C, H, LK		
PTX-0725	2023-03-23 Natera Weekly Update: Natera Attends Cancer Moonshot Forum at White House	NAT-AR-00827188-NAT-AR-00827190	R, 403, A, BE, C, H, LK		
PTX-0726	Spreadsheet: 2023-03-20 Signatera Financials	NAT-AR-00827183	R, 403, A, C, H, LK		
PTX-0727	CPG Sec. 110.100 Certification for Exports April 2000	NAT-AR-00806239-NAT-AR-00806247	R, 403, A, C, H, LK		
PTX-0728	U.S. Patent Application No. 13/300,235 filed November 18, 2011	NAT-AR-00244080-NAT-AR-00244280	R, 403, A, C, H, LK		
PTX-0729	Intentionally Left Blank				
PTX-0730	2021-11-08 Refinitiv Streetevents - Q3 2021 Invitae Corp Earnings Call	NAT-AR-01011265-NAT-AR-01011281	403, A, C, H, IO, LK, NP, R		
PTX-0731	Archer FusionPlex Protocol for Illumina LA 135.G	NAT-AR-00803231-NAT-AR-00803254	403, A, C, H, IO, LK, NP, R		
PTX-0732	2017-02-16 Archer VariantPlex Protocol for Illumina LA377.A	NAT-AR-00803214-NAT-AR-00803229	403, A, C, H, IO, LK, NP, R		
PTX-0733	2021-01-12 [116-2] ArcherDX Receives Approval for ArcherMET Companion Diagnostic for TEPMETKO (Tepotinib) in Advanced Non-Small Cell Lung Cancer in Japan	NAT-AR-00803334-NAT-AR-00803336	403, A, C, H, IO, LK, NP, R		
PTX-0734	Reinert ctDNA ultra-deep sequencing in stage I to III CRC JAMA Onc 2019	NAT-AR-00270184-00270191	403, A, C, H, IO, LK, NP, R		
PTX-0735	2020-06-22 Invitae Transforming medical genetics worldwide	NAT-AR-00117721-NAT-AR-00117747	403, A, C, H, IO, LK, NP, R		
PTX-0736	Email from Zimmermann to Dodd re 53-plex forward primers extended with mismatching two bases on 5' end	NAT-AR-00315925-NAT-AR-00315927	403, A, BE, C, IO, NP		
PTX-0737	2011-05-27 Zimmermann to Dodd re Additional primer3 parameters for more accurate Tm calculations	NAT-AR-00315928-NAT-AR-00315929	403, A, BE, C, IO, NP		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0738	AACC TV Archer DX Video	NAT-AR-00347310	403, A, BE, C, H, IO, NP, R		
PTX-0739	Corporate Medical Video Production, Boulder CO, Archer DX Video	NAT-AR-00347502	403, A, BE, C, H, IO, NP, R		
PTX-0740	Detecting meaningful mutations from liquid biopsies by Anchored Multiplex PCR - Archer AMP Chemistry Page Video	NAT-AR-00347503	403, A, BE, C, H, IO, NP, R		
PTX-0741	Channel 8 - St. Vincent's doctor discusses new blood test that can detect certain cancer cells, Signatera Video	NAT-AR-00703058	403, A, BE, C, H, IO, NP, R		
PTX-0742	2020-10-15 Email from Brophy to Champman re more decks	NAT-AR-00570251	403, A, C, H, IO, LK, NP, R		
PTX-0743	September 2020 Natera Presentation	NAT-AR-00570252-NAT-AR-00570258	403, A, C, H, IO, LK, NP, R		
PTX-0744	2020-08-05 Second Quarter 2020 Earnings Presentation	NAT-AR-00570259-NAT-AR-00570278	403, A, C, H, IO, LK, NP, R		
PTX-0745	2018-07-10 [001] Complaint (Archer v. Qiagen, 18-1019)	NAT-AR-00707824-NAT-AR-00707872	403, C, NP, R		
PTX-0746	Intentionally Left Blank				
PTX-0747	2019-10-30 [130] Amended Complaint (Archer v. Qiagen, 18-1019)	NAT-AR-00708977-NAT-AR-00709035	403, C, NP, R		
PTX-0748	Targeted RNA & DNA Sequencing	NAT-AR-00753513-NAT-AR-00753957	403, A, C, H, IO, LK, NP, R		
PTX-0749	Intentionally Left Blank				
PTX-0750	Intentionally Left Blank				
PTX-0751	Intentionally Left Blank				
PTX-0752	2020 April (1st edition) ArcherMET companion diagnostic system IFU3.2	ARCHER00036413-ARCHER00036416	403, A, C, H, LK, IO, NP, R		
PTX-0753	Stratafide DNA Assay Procedure AP2.3	ARCHER00036383-ARCHER00036412	403, A, C, H, LK, IO, NP, R		
PTX-0754	ArcherDX Companion Diagnostic Overview Presentation	ARCHER00041506-ARCHER00041540	403, A, C, H, LK, IO, NP, R		
PTX-0755	Archer Technical Note: The Use of Molecular Barcodes in Anchored Multiplex PCR (APM028.A)	ARCHER00041413-ARCHER00041415	403, A, C, H, LK, IO, NP, R		
PTX-0756	STRATAFIDE ctDNA Assay Procedure AP1.1	ARCHER00036592-ARCHER00036619	403, A, C, H, LK, IO, NP, R		
PTX-0757	Appendix M1-49: Test Method Validation Plan for Stratafide ctDNA and RNA Kit Bundle VP-20-076.0	ARCHER00045479-ARCHER00045493	403, A, C, H, LK, IO, NP, R		
PTX-0758	Appendix M1-39: Stratafide Assay Manufacturing Plan DHF17-A-1-18.1	ARCHER00045375-ARCHER00045405	403, A, C, H, LK, IO, NP, R		
PTX-0759	Archer Original Investigational Device Exemption Application MET Variant Test on the Reveal DX Assay	ARCHER00042366-ARCHER00042494	403, A, C, H, LK, IO, NP, R		
PTX-0760	Archer MET AMP Test on the RevealDX Assay for ctDNA Instructions for Use	ARCHER00027341-ARCHER00027363	403, A, C, H, LK, IO, NP, R		
PTX-0761	Archer MET Variant Test on the RevealDX Assay for ctDNA Instructions for Use	ARCHER00027644-ARCHER00027667	403, A, C, H, LK, IO, NP, R		
PTX-0762	Archer-MRD-002 Request for Study Risk Determination McRmaid 1	ARCHER00044025-ARCHER00044043	403, A, C, H, LK, IO, NP, R		
PTX-0763	Archer STRATAFIDE NTRK Fusions Assay Breakthrough Designation Request	ARCHER00047577-ARCHER00047593	403, A, C, H, LK, IO, NP, R		
PTX-0764	2019-10-08 Archer letter to FDA re Request for Pre-Submission meeting re the Archer MRD Assay	ARCHER00043821	403, A, C, H, LK, IO, NP, R		
PTX-0765	APM100.1 Anchored Multiplex PCR enables sensitive NGS-based mutation detection and design flexibility for FFPE samples Poster	ARCHER00041263	403, A, C, H, LK, IO, NP, R		
PTX-0766	Archer RevealDX System Breakthrough Designation Request	ARCHER00043797-ARCHER00043816	403, A, C, H, LK, IO, NP, R		
PTX-0767	Archer Attachment 1 Initial IFU for METvar ctDNA Test Kit	ARCHER00044913-ARCHER00044938	403, A, C, H, LK, IO, NP, R		
PTX-0768	IFU6.0 STRATAFIDE DNA Instructions for Use	ARCHER00027550-ARCHER00027581	403, A, C, H, LK, IO, NP, R		
PTX-0769	Archer NOTCH For DNA Instructions for use CS852	ARCHER00027436-ARCHER00027469	403, A, C, H, LK, IO, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0770	Archer Instructions for Use IFU2.1	ARCHER00027811-ARCHER00027857	403, A, C, H, LK, IO, NP, R		
PTX-0771	STRATAFIDE RNA Assay Procedure Interactive Assay and Worksheet IFU12.0	ARCHER00036417-ARCHER00036492	403, A, C, H, LK, IO, NP, R		
PTX-0772	2020-03-10 Archer Letter to FDA re Request for Study Risk Determination	ARCHER00044024	403, A, C, H, LK, IO, NP, R		
PTX-0773	Archer Original investigational Device Exemption Application ArcherDX MET Variant Test on the RevealDX Assay	ARCHER00042130-ARCHER00042238	403, A, C, H, LK, IO, NP, R		
PTX-0774	MET AMP Test on the RevealDX Assay System for ctDNA Instructions for Use IFU-GMSK0010.2	ARCHER00036329-ARCHER00036354	403, A, C, H, LK, IO, NP, R		
PTX-0775	ArcherDX Compansion Diagnostic Overview: Commercial Capabilities Discussion GSK 2020 Presentation	ARCHER00041446-ARCHER00041503	403, A, C, H, LK, IO, NP, R		
PTX-0776	Archer Advancing Personalized Medicine Presentation	ARCHER00040911-ARCHER00041068	403, A, C, H, LK, IO, NP, R		
PTX-0777	STRATAFIDE RNA Assay Procedure AP3.1	ARCHER00036512-ARCHER00036544	403, A, C, H, LK, IO, NP, R		
PTX-0778	Archer MRD Assay Pre-Submission Meeting Request	ARCHER00043822-ARCHER00043858	403, A, C, H, LK, IO, NP, R		
PTX-0779	Archer G190227 IDE 5-Day Notice In-Process Controls and Kit Configuration MET Variant Test on the RevealDX Assay	ARCHER00044689-ARCHER00044714	403, A, C, H, LK, IO, NP, R		
PTX-0780	Archer MET Variant Test on the RevealDX Assay for ctDNA	ARCHER00027414-ARCHER00027435	403, A, C, H, LK, IO, NP, R		
PTX-0781	Archer MRD Assay Breakthrough Designation Request	ARCHER00043925-ARCHER00043944	403, A, C, H, LK, IO, NP, R		
PTX-0782	Archer MRD Assay for ctDNA Instructions for Use LA812.0	ARCHER00027364-ARCHER00027381	403, A, C, H, LK, IO, NP, R		
PTX-0783	Archer MRD Assay for ctDNA AP4.3	ARCHER00036294-ARCHER00036328	403, A, C, H, LK, IO, NP, R		
PTX-0784	Archer MRD Assay for ctDNA Instructions for Use IFU1.2	ARCHER00027582-ARCHER00027609	403, A, C, H, LK, IO, NP, R		
PTX-0785	STRATAFIDE RNA Instructions for Use IFU7.0	ARCHER00027610-ARCHER00027643	403, A, C, H, LK, IO, NP, R		
PTX-0786	Archer Study Risk Determination ArcherDX METAMP Test on Archer RevealDX Assay System	ARCHER00044389-ARCHER00044403	403, A, C, H, LK, IO, NP, R		
PTX-0787	Archer MRD Assay Breakthrough Designation Request	ARCHER00043954-ARCHER00043973	403, A, C, H, LK, IO, NP, R		
PTX-0788	Archer Appendix 2 Initial IFU for METvar RNA Test Kit	ARCHER00044879-ARCHER00044907	403, A, C, H, LK, IO, NP, R		
PTX-0789	Archer Appendix 23 Diagnostic Protocol	ARCHER00041632-ARCHER00041665	403, A, C, H, LK, IO, NP, R		
PTX-0790	STRATAFIDE ctDNA Instructions for Use IFU5.0	ARCHER00027781-ARCHER00027810	403, A, C, H, LK, IO, NP, R		
PTX-0791	Archer MET Instructions for Use IFU2.2	ARCHER00036545-ARCHER00036591	403, A, C, H, LK, IO, NP, R		
PTX-0792	2020-06-23 GMSA0001 AL017499 Work Order QCR	ARCHER00027898-ARCHER00028045	403, A, C, H, IL, IO, LK, NP, R		
PTX-0793	Spreadsheet: Archer Sales 2020 -YTD US CDx and RUO sales 20JAN20 to 31AUG20	ARCHER00041543	403, A, C, H, LK, IO, NP, R		
PTX-0794	ArcherPost-Approval Update Strategy Supplemental Content to Q181970 Pre-Submission Meeting Request	ARCHER00043673-ARCHER00043749	403, A, C, H, LK, IO, NP, R		
PTX-0795	Archer MET Product Insert IFU3.1	ARCHER00027697-ARCHER00027741	403, A, C, H, LK, IO, NP, R		
PTX-0796	ArcherDX MET Variant Test on the RevealDX Assay Original Investigational Device Exemption Application	ARCHER00044509-ARCHER00044627	403, A, C, H, LK, IO, NP, R		
PTX-0797	ArcherDX STRATAFIDE Dx Tepontinib CDx Premarketing Application	ARCHER00044976-ARCHER00045056	403, A, C, H, LK, IO, NP, R		
PTX-0798	Archer Appendix 1 Updated IFU for METvar RNA Test Kit	ARCHER00044845-ARCHER00044878	403, A, C, H, LK, IO, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0799	2020-03-09 AstraZeneca Durvalumab D910LC00001 Clinical Trial Protocol V1	ARCHER00044044-ARCHER00044251	403, A, C, H, LK, IO, NP, R		
PTX-0800	Intentionally Left Blank				
PTX-0801	13733_DNA_IVD_v0252b2_indelFix_duplicated_removed_primers_no_tails.fasta	ARCHER00048496	403, A, C, H, IL, IO, LK, NP, R		
PTX-0802	13215_cGSP5061_Universal_ctDNA_v10_primers_no_tails.fasta	ARCHER00048494	403, A, C, H, IL, IO, LK, NP, R		
PTX-0803	12929_Universal_IVD_RNA_v03b1_primers_no_tails.fasta	ARCHER00048492	403, A, C, H, IL, IO, LK, NP, R		
PTX-0804	13733_DNA_IVD_v0252b2_indelFix_duplicated_removed_primers.fasta	ARCHER00048495	403, A, C, H, IL, IO, LK, NP, R		
PTX-0805	12929_Universal_IVD_RNA_v03b1_primers.fasta	ARCHER00048491	403, A, C, H, IL, IO, LK, NP, R		
PTX-0806	13215_cGSP5061_Universal_ctDNA_v10_primers.fasta	ARCHER00048493	403, A, C, H, IL, IO, LK, NP, R		
PTX-0807	Spreadsheet: RUO Catalog Panels GSP Sequences	ARCHER00049526	403, A, C, H, LK, IO, NP, R		
PTX-0808	Spreadsheet: PCM Primer Orders No Tails	ARCHER00049525	403, A, C, H, LK, IO, NP, R		
PTX-0809	Spreadsheet: PCM Primer Orders Full Sequences	ARCHER00049524	403, A, C, H, LK, IO, NP, R		
PTX-0810	2017-09-20 Archer VariantPlex Somatic Protocol for Illumina LA560.B	ARCHER00049821-ARCHER00049840	403, A, C, H, LK, IO, NP, R		
PTX-0811	2018-06-06 Archer FusionPlex Protocol for Illumina LA135.G	ARCHER00049797-ARCHER00049820	403, A, C, H, LK, IO, NP, R		
PTX-0812	Spreadsheet: 2020-07-02 Custom Catalog Cycling Condition Reference	ARCHER00049773	403, A, C, H, LK, IO, NP, R		
PTX-0813	2020-07-09 Archer LiquidPlex™ Protocol for Illumina LA090.2	ARCHER00049774-ARCHER00049796	403, A, C, H, LK, IO, NP, R		
PTX-0814	VariantPlex® St. Jude 27 Gene Panel LA770.0	ARCHER00049975-ARCHER00049977	403, A, C, H, LK, IO, NP, R		
PTX-0815	LiquidPlex™ ctDNA 28 LA173.0	ARCHER00049844-ARCHER00049847	403, A, C, H, LK, IO, NP, R		
PTX-0816	VariantPlex SNP BRCA LA770.0	ARCHER00049989-ARCHER00049991	403, A, C, H, LK, IO, NP, R		
PTX-0817	LiquidPlex™ CBL LA771.1	ARCHER00050025-ARCHER00050026	403, A, C, H, LK, IO, NP, R		
PTX-0818	VariantPlex® GynCore LA770.0	ARCHER00050005-ARCHER00050007	403, A, C, H, LK, IO, NP, R		
PTX-0819	VariantPlex® Dresden Erythrozytos LA769.0	ARCHER00049868-ARCHER00049869	403, A, C, H, LK, IO, NP, R		
PTX-0820	VariantPlex® NNGM Lung Focus v2 LA770.0	ARCHER00050211-ARCHER00050213	403, A, C, H, LK, IO, NP, R		
PTX-0821	FusionPlex® Solid Tumor LA179.B	ARCHER00049862-ARCHER00049865	403, A, C, H, LK, IO, NP, R		
PTX-0822	VariantPlex® Austin Lymphoma LA770.0	ARCHER00049917-ARCHER00049919	403, A, C, H, LK, IO, NP, R		
PTX-0823	FusionPlex MelanoLung LA776.0	ARCHER00050109-ARCHER00050110	403, A, C, H, LK, IO, NP, R		
PTX-0824	FusionPlex CCF Heme LA776.0	ARCHER00050083-ARCHER00050084	403, A, C, H, LK, IO, NP, R		
PTX-0825	FusionPlex Essen Sarcoma LA776.0	ARCHER00050299-ARCHER00050300	403, A, C, H, LK, IO, NP, R		
PTX-0826	LiquidPlex SeraCare Gmini LA771.1	ARCHER00050021-ARCHER00050022	403, A, C, H, LK, IO, NP, R		
PTX-0827	VariantPlex PIK3CA LA770.0	ARCHER00050011-ARCHER00050012	403, A, C, H, LK, IO, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0828	FusionPlex OncoClinicas Solid Tumor v2 LA776.0	ARCHER00050071-ARCHER00050072	403, A, C, H, LK, IO, NP, R		
PTX-0829	FusionPlex CD19 LA776.0	ARCHER00050041-ARCHER00050042	403, A, C, H, LK, IO, NP, R		
PTX-0830	FusionPlex Cologne Salivary LA776.0	ARCHER00050091-ARCHER00050092	403, A, C, H, LK, IO, NP, R		
PTX-0831	VariantPlex Pathgroup PanCancer LA770.0	ARCHER00049969-ARCHER00049971	403, A, C, H, LK, IO, NP, R		
PTX-0832	VariantPlex Karaiskakio Foundation Comprehensive Solid Tumor LA770.0	ARCHER00049949-ARCHER00049951	403, A, C, H, LK, IO, NP, R		
PTX-0833	LiquidPlex Lung Focus LA771.1	ARCHER00050035-ARCHER00050036	403, A, C, H, LK, IO, NP, R		
PTX-0834	FusionPlex Seattle Children's Heme v4 LA776.0	ARCHER00050075-ARCHER00050076	403, A, C, H, LK, IO, NP, R		
PTX-0835	VariantPlex Cardiomyopathy LA769.0	ARCHER00050162-ARCHER00050164	403, A, C, H, LK, IO, NP, R		
PTX-0836	FusionPlex CHW Solid Tumor LA776.0	ARCHER00050045-ARCHER00050046	403, A, C, H, LK, IO, NP, R		
PTX-0837	FusionPlex CHU GTS Cerebral LA776.0	ARCHER00050085-ARCHER00050086	403, A, C, H, LK, IO, NP, R		
PTX-0838	FusionPlex D-MARK Lung LA776.0	ARCHER00050095-ARCHER00050096	403, A, C, H, LK, IO, NP, R		
PTX-0839	VariantPlex CHU Rouen Product Insert LA770.0	ARCHER00050182-ARCHER00050184	403, A, C, H, LK, IO, NP, R		
PTX-0840	FusionPlex OPBG Pediatric Cancer LA776.0	ARCHER00050115-ARCHER00050116	403, A, C, H, LK, IO, NP, R		
PTX-0841	VaraintPlex LimitlessDx Pharmacogenomics LA769.0	ARCHER00050165-ARCHER00050167	403, A, C, H, LK, IO, NP, R		
PTX-0842	VariantPlex CRISPRTX FAAH LA770.0	ARCHER00050185-ARCHER00050187	403, A, C, H, LK, IO, NP, R		
PTX-0843	VariantPlex Dlongwood TP53 LA770.0	ARCHER00049934-ARCHER00049936	403, A, C, H, LK, IO, NP, R		
PTX-0844	VariantPlex BRCA+PALB2 LA770.0	ARCHER00050248-ARCHER00050249	403, A, C, H, LK, IO, NP, R		
PTX-0845	VariantPlex PGIMER ALL LA770.0	ARCHER00050258-ARCHER00050260	403, A, C, H, LK, IO, NP, R		
PTX-0846	VariantPlex ICON Solid Tumor LA770.0	ARCHER00050236-ARCHER00050238	403, A, C, H, LK, IO, NP, R		
PTX-0847	VariantPlex SFAv3 LA776.0	ARCHER00050321-ARCHER00050322	403, A, C, H, LK, IO, NP, R		
PTX-0848	FusionPlex Tubingen Brain Focus LA776.0	ARCHER00050331-ARCHER00050332	403, A, C, H, LK, IO, NP, R		
PTX-0849	FusionPlex Comprehensive Sarcoma LA776.0	ARCHER00050301-ARCHER00050302	403, A, C, H, LK, IO, NP, R		
PTX-0850	FusionPlex NTRK LA776.0	ARCHER00050311-ARCHER00050312	403, A, C, H, LK, IO, NP, R		
PTX-0851	VariantPlex UCI Myeloid LA770.0	ARCHER00049978-ARCHER00049979	403, A, C, H, LK, IO, NP, R		
PTX-0852	FusionPlex Cologne Sarcoma LA776.0	ARCHER00050093-ARCHER00050094	403, A, C, H, LK, IO, NP, R		
PTX-0853	VariantPlex Custom Myeloid LA770.0	ARCHER00049982-ARCHER00049983	403, A, C, H, LK, IO, NP, R		
PTX-0854	VariantPlex SJClinGenCustom LA770.0	ARCHER00049972-ARCHER00049974	403, A, C, H, LK, IO, NP, R		
PTX-0855	VariantPlex Karaiskakio Solid Tumor LA770.0	ARCHER00049952-ARCHER00049954	403, A, C, H, LK, IO, NP, R		
PTX-0856	VariantPlex John Hunter Solid Tumor Focus LA770.0	ARCHER00050203-ARCHER00050205	403, A, C, H, LK, IO, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0857	LiquidPlex 28+BRCA1/2 LA771.1	ARCHER00050263-ARCHER00050264	403, A, C, H, LK, IO, NP, R		
PTX-0858	VariantPlex DICER1 LA770.0	ARCHER00050253-ARCHER00050254	403, A, C, H, LK, IO, NP, R		
PTX-0859	LiquidPlex Celgene LA771.1	ARCHER00050027-ARCHER00050029	403, A, C, H, LK, IO, NP, R		
PTX-0860	FusionPlex BCOH Histiocytosis v2 LA776.0	ARCHER00050077-ARCHER00050078	403, A, C, H, LK, IO, NP, R		
PTX-0861	FusionPlex COH Pan Cancer LA776.0	ARCHER00050047-ARCHER00050048	403, A, C, H, LK, IO, NP, R		
PTX-0862	VariantPlex AML Focus v2 LA770.0	ARCHER00049914-ARCHER00049916	403, A, C, H, LK, IO, NP, R		
PTX-0863	VariantPlex Comprehensive NCH Solid Tumor LA770.0	ARCHER00050000-ARCHER00050002	403, A, C, H, LK, IO, NP, R		
PTX-0864	FusionPlex® Pan Solid Tumor	ARCHER00049855-ARCHER00049861	403, A, C, H, LK, IO, NP, R		
PTX-0865	VariantPlex Alaggio Solid Tumor LA770.0	ARCHER00050168-ARCHER00050170	403, A, C, H, LK, IO, NP, R		
PTX-0866	FusionPlex Leidos-NCI Pan Solid Tumor LA776.0	ARCHER00050305-ARCHER00050306	403, A, C, H, LK, IO, NP, R		
PTX-0867	FusionPlex SNUH Pan Cancer LA776.0	ARCHER00050123-ARCHER00050124	403, A, C, H, LK, IO, NP, R		
PTX-0868	VariantPlex DermTech LA770.0	ARCHER00050188-ARCHER00050190	403, A, C, H, LK, IO, NP, R		
PTX-0869	FusionPlex IPA custom large panel V1 LA776.0	ARCHER00050103-ARCHER00050104	403, A, C, H, LK, IO, NP, R		
PTX-0870	VariantPlex Pathgroup Heme Complete LA770.0	ARCHER00050220-ARCHER00050222	403, A, C, H, LK, IO, NP, R		
PTX-0871	FusionPlex Onco Lung LA776.0	ARCHER00050313-ARCHER00050314	403, A, C, H, LK, IO, NP, R		
PTX-0872	LiquidPlex Comprehensive NCH Solid Tumor LA771.1	ARCHER00050270-ARCHER00050272	403, A, C, H, LK, IO, NP, R		
PTX-0873	FusionPlex TCH Heme LA776.0	ARCHER00050127-ARCHER00050128	403, A, C, H, LK, IO, NP, R		
PTX-0874	FusionPlex Maestro ACC Expanded Sarcoma LA776.0	ARCHER00050107-ARCHER00050108	403, A, C, H, LK, IO, NP, R		
PTX-0875	VariantPlex BCOH Oncology LA770.0	ARCHER00050177-ARCHER00050178	403, A, C, H, LK, IO, NP, R		
PTX-0876	FusionPlex Takara Bio LA776.0	ARCHER00050325-ARCHER00050326	403, A, C, H, LK, IO, NP, R		
PTX-0877	FusionPlex University Cologne FP Kinderonko LA776.0	ARCHER00050335-ARCHER00050336	403, A, C, H, LK, IO, NP, R		
PTX-0878	VariantPlex TJH Custom CTL+SMAD4 LA770.0	ARCHER00049899-ARCHER00049900	403, A, C, H, LK, IO, NP, R		
PTX-0879	VariantPlex Austin Myeloid LA770.0	ARCHER00049879-ARCHER00049880	403, A, C, H, LK, IO, NP, R		
PTX-0880	FusionPlex Expanded Sarcoma Product Insert	ARCHER00050147-ARCHER00050154	403, A, C, H, LK, IO, NP, R		
PTX-0881	LiquidPlex Linz Pancreas LA771.1	ARCHER00050019-ARCHER00050020	403, A, C, H, LK, IO, NP, R		
PTX-0882	Biopstick AST2 LA776.0	ARCHER00050079-ARCHER00050080	403, A, C, H, LK, IO, NP, R		
PTX-0883	FusionPlex Cologne Lymphoma LA776.0	ARCHER00050089-ARCHER00050090	403, A, C, H, LK, IO, NP, R		
PTX-0884	VariantPlex OncoClinicas Solid Tumor v3 Product Insert LA770.0	ARCHER00049876-ARCHER00049878	403, A, C, H, LK, IO, NP, R		
PTX-0885	VariantPlex VCU Myeloid LA770.0	ARCHER00049992-ARCHER00049994	403, A, C, H, LK, IO, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0886	VariantPlex Cellnetix Core Lymphoma LA770.0	ARCHER00049922-ARCHER00049924	403, A, C, H, LK, IO, NP, R		
PTX-0887	LiquidPlex Oxford CEDAR LA771.1	ARCHER00050037-ARCHER00050038	403, A, C, H, LK, IO, NP, R		
PTX-0888	LiquidPlex Leidos MMR LA771.1	ARCHER00050017-ARCHER00050018	403, A, C, H, LK, IO, NP, R		
PTX-0889	FusionPlex Myeloid Focus LA776.0	ARCHER00050067-ARCHER00050068	403, A, C, H, LK, IO, NP, R		
PTX-0890	VariantPlex Dynamic Inherited Cancer Product Insert	ARCHER00049853-ARCHER00049854	403, A, C, H, LK, IO, NP, R		
PTX-0891	VariantPlex USYD Melanoma LA770.0	ARCHER00049980-ARCHER00049981	403, A, C, H, LK, IO, NP, R		
PTX-0892	VariantPlex OHSU Tier 1 LA770.0	ARCHER00049960-ARCHER00049962	403, A, C, H, LK, IO, NP, R		
PTX-0893	VariantPlex HHR LA770.0	ARCHER00049891-ARCHER00049892	403, A, C, H, LK, IO, NP, R		
PTX-0894	VariantPlex Austin Solid Tumor LA770.0	ARCHER00049881-ARCHER00049882	403, A, C, H, LK, IO, NP, R		
PTX-0895	FusionPlex MSKCC SolidTumor v5 LA776.0	ARCHER00050155-ARCHER00050156	403, A, C, H, LK, IO, NP, R		
PTX-0896	VariantPlex FLT3-ITD and NPM1 LA770.0	ARCHER00049937-ARCHER00049939	403, A, C, H, LK, IO, NP, R		
PTX-0897	VariantPlex IS NSW Myeloid LA770.0	ARCHER00049907-ARCHER00049908	403, A, C, H, LK, IO, NP, R		
PTX-0898	FusionPlex TRACRx NSCLC LA776.0	ARCHER00050129-ARCHER00050130	403, A, C, H, LK, IO, NP, R		
PTX-0899	FusionPlex Saint Louis CTL LA776.0	ARCHER00050119-ARCHER00050120	403, A, C, H, LK, IO, NP, R		
PTX-0900	FusionPlex IPA Small v1 LA776.0	ARCHER00050063-ARCHER00050064	403, A, C, H, LK, IO, NP, R		
PTX-0901	FusionPlex CHOP v3 Product Insert LA776.0	ARCHER00050043-ARCHER00050044	403, A, C, H, LK, IO, NP, R		
PTX-0902	VariantPlexHemochromatosis v2 LA770.0	ARCHER00050197-ARCHER00050199	403, A, C, H, LK, IO, NP, R		
PTX-0903	FusionPlex Opera Padre Pio NRG LA776.0	ARCHER00050317-ARCHER00050318	403, A, C, H, LK, IO, NP, R		
PTX-0904	VariantPlex Duke Solid Tumor LA770.0	ARCHER00049887-ARCHER00049888	403, A, C, H, LK, IO, NP, R		
PTX-0905	FusionPlex Takara Bio LA770.0	ARCHER00050209-ARCHER00050210	403, A, C, H, LK, IO, NP, R		
PTX-0906	VariantPlex Universal Expanded Solid Tumor LA770.0	ARCHER00050157-ARCHER00050159	403, A, C, H, LK, IO, NP, R		
PTX-0907	Archer NOTCH for RNA Instructions for Use CS824.1	ARCHER00050339-ARCHER00050373	403, A, C, H, LK, IO, NP, R		
PTX-0908	FusionPlex Oncology Research LA181.1	ARCHER00050872-ARCHER00050876	403, A, C, H, LK, IO, NP, R		
PTX-0909	Archer NOTCH for DNA Instructions for Use CS852	ARCHER00050451-ARCHER00050484	403, A, C, H, LK, IO, NP, R		
PTX-0910	Archer Array Overview Presentation	ARCHER01004509-ARCHER01004522	403, A, C, H, LK, IO, NP, R		
PTX-0911	Archer Reveal ctDNA Presentation	ARCHER01000963-ARCHER01001012	403, A, C, H, LK, IO, NP, R		
PTX-0912	US 2012/0270212 (Rabinowitz)	ARCHER00052234-ARCHER00052326	A		
PTX-0913	U.S. Patent No. 10,450,597 (Iafrate)	ARCHER00052100-ARCHER00052147	A		
PTX-0914	Hyndman, David L. (2003) PCR Primer Design, Chapter 19, PCR Protocols 2nd Edition	ARCHER00051333-ARCHER00051341	A		
PTX-0915	Intentionally Left Blank				
PTX-0916	Intentionally Left Blank				
PTX-0917	Intentionally Left Blank				

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0918	RevealDX METex14 Proposed Intended Use/Indications for Use	ARCHER01083759-ARCHER01083776	403, A, C, H, IO, LK, NP, R		
PTX-0919	Archer Building a better test with AMP and ArcherDx...Its not just SNVs	ARCHER01120625-ARCHER01120650	403, A, C, H, IO, LK, NP, R		
PTX-0920	2019-03-19 Archer Open Commercial Questions	ARCHER01016988-ARCHER01017001	403, A, C, H, IO, LK, NP, R		
PTX-0921	2016-05-06 Asset Purchase Agreement between ArcherDx and LaunchWorks	ARCHER01009305-ARCHER01009361	403, A, C, H, IO, LK, NP, R		
PTX-0922	March 2019 Archer Technology Deep Dive Presentation	ARCHER01110735-ARCHER01110765	403, A, C, H, IO, LK, NP, R		
PTX-0923	FusionPlex®Sarcoma Product Insert	ARCHER01048565-ARCHER01048566	403, A, C, H, IO, LK, NP, R		
PTX-0924	ArcherDX METex on14 ctDNA Clinical Trial Assay Manufacturing Information	ARCHER01108190-ARCHER01108216	403, A, C, H, IO, LK, NP, R		
PTX-0925	Spreadsheet: Archer 2017-2018 Pharma	ARCHER01078119	403, A, C, H, IO, LK, NP, R		
PTX-0926	2014-12-16 Supply and manufacturing Agreement between ArcherDX and Qiagen	ARCHER01049515-ARCHER01049535	403, A, C, H, IO, LK, NP, R		
PTX-0927	20106-08-08 Archer Introducing ArcherDX cfDNA Presentation	ARCHER01080337-ARCHER01080371	403, A, C, H, IO, LK, NP, R		
PTX-0928	Intentionally Left Blank				
PTX-0929	2017-08-03 Archer Technology Overview	ARCHER01052264-ARCHER01052314	403, A, C, H, IO, LK, NP, R		
PTX-0930	Pre-Sub Meeting Request: Proposed Product Design, Technology and Clinical Interpretation for the ArcherDX RevealDX Lung Diagnostic System	ARCHER01052325-ARCHER01052353	403, A, C, H, IO, LK, NP, R		
PTX-0931	ctDNA SNPID Supplementary Module for Reveal 28 Product Insert LA###.A	ARCHER01083140	403, A, C, H, IO, LK, NP, R		
PTX-0932	Archer Investor Deck Presentation	ARCHER01008931-ARCHER01008970	403, A, C, H, IO, LK, NP, R		
PTX-0933	2019-04-25 Exhibit to Master Lab Service Agreement between ArcherDX and Celgene	ARCHER01097848-ARCHER01097850	403, A, C, H, IO, LK, NP, R		
PTX-0934	VariantPlex® SNPID Supplementary Module for STVP Product Insert LA###.A	ARCHER01116816	403, A, C, H, IO, LK, NP, R		
PTX-0935	2018-06-06 Archer FusionPlex Protocol for Illumina LA135.G	ARCHER01116857-ARCHER01116880	403, A, C, H, IO, LK, NP, R		
PTX-0936	Revenue/EBITDA Forebat 2019-2025 Presentation	ARCHER01016460-ARCHER01016461	403, A, C, H, IO, LK, NP, R		
PTX-0937	March 2019 ArcherDX Overview Presentation	ARCHER01089406-ARCHER01089435	403, A, C, H, IO, LK, NP, R		
PTX-0938	Archer Vision Presenation	ARCHER01057627-ARCHER01057664	403, A, C, H, IO, LK, NP, R		
PTX-0939	2018-05-11 Wolf Greefield Memo to ArcherDX re Patent/trade secret litigation against Qiagen	ARCHER01020855-ARCHER01020865	403, A, C, H, IO, LK, NP, R		
PTX-0940	October 2018 Archer Investor Presentation	ARCHER01028646-ARCHER01028662	403, A, C, H, IO, LK, NP, R		
PTX-0941	2016-12-20 Amendment No. 1 to Supply Agreement between Qiagen and ArcherDx	ARCHER01061775-ARCHER01061778	403, A, C, H, IO, LK, NP, R		
PTX-0942	2017-12-12 Supply Agreement between Genoptix and ArcherDx	ARCHER01088238-ARCHER01088262	403, A, C, H, IO, LK, NP, R		
PTX-0943	ArcherDX 409A Valuation as of March 31, 2018	ARCHER01030453-ARCHER01030513	403, A, C, H, IO, LK, NP, R		
PTX-0944	Spreadsheet: 2018-03-23 Archer Model	ARCHER01043746	403, A, C, H, IO, LK, NP, R		
PTX-0945	2017 ArcherDx Market Strategy	ARCHER01041824-ARCHER01041830	403, A, C, H, IO, LK, NP, R		
PTX-0946	2013-03-04 Material Transfer and Evaluation Agreement between Pfizer and ArcherDx	ARCHER01040815-ARCHER01040818	403, A, C, H, IO, LK, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0947	2017-12-15 Email from Stahl to Abbosh re Update regarding post pilot project	ARCHER01100376	403, A, C, H, IO, LK, NP, R		
PTX-0948	October 2018 Archer Investor Presentation	ARCHER01074989-ARCHER01075000	403, A, C, H, IO, LK, NP, R		
PTX-0949	2017-09-20 VariantPlex Somatic Reagents for Illumina Protocol LA560.B	ARCHER01010651-ARCHER01010669	403, A, C, H, IO, LK, NP, R		
PTX-0950	2019-06-21 Draft proposals: Universal CDx launch support Personalized cancer monitoring strategy	ARCHER01064578-ARCHER01064644	403, A, C, H, IO, LK, NP, R		
PTX-0951	March 2019 ArcherDX Overview Presentation	ARCHER01112106-ARCHER01112150	403, A, C, H, IO, LK, NP, R		
PTX-0952	Spreadsheet: Royalty Support Q3 & Q4 2017	ARCHER01056111	403, A, C, H, IO, LK, NP, R		
PTX-0953	TRACERx Archer CRO proof of concept study	ARCHER01100377-ARCHER01100378	403, A, C, H, IO, LK, NP, R		
PTX-0954	VariantPlex Myeloid Product Insert LA011.A	ARCHER01040982-ARCHER01040987	403, A, C, H, IO, LK, NP, R		
PTX-0955	Pre-Sub Meeting Request: Proposed Product Design, Technology and Clinical Interpretation for the ArcherDX RevealDX Lung Diagnostic System	ARCHER01062651-ARCHER01062679	403, A, C, H, IO, LK, NP, R		
PTX-0956	Spreadsheet: VariantPlexCTL_9750	ARCHER01120795	403, A, C, H, IO, LK, NP, R		
PTX-0957	FusionPlex CTL 9749	ARCHER01120784	403, A, C, H, IO, LK, NP, R		
PTX-0958	FusionPlex Sarcoma 10466	ARCHER01120791	403, A, C, H, IO, LK, NP, R		
PTX-0959	FusionPlex ORP 12257	ARCHER01120789	403, A, C, H, IO, LK, NP, R		
PTX-0960	STRATAFIDE RNA 12929	ARCHER01120800	403, A, C, H, IO, LK, NP, R		
PTX-0961	FusionPlex Solid Tumor 10493	ARCHER01120792	403, A, C, H, IO, LK, NP, R		
PTX-0962	VariantPlex Solid Tumor 11426	ARCHER01120797	403, A, C, H, IO, LK, NP, R		
PTX-0963	FusionPlex Lung 5855	ARCHER01120786	403, A, C, H, IO, LK, NP, R		
PTX-0964	STRATAFIDE cfDNA 13215	ARCHER01120798	403, A, C, H, IO, LK, NP, R		
PTX-0965	2020-06-21 Invitae Corporation Acquisition of ArcherDx Project Apollo/Alaska	ARCHER01120801-ARCHER01122733	403, A, C, H, IO, LK, NP, R		
PTX-0966	2020-08-26 Email from Hewlett to Pointer re Signature receives CE mark	ARCHER01167010	403, A, C, H, IO, LK, NP, R		
PTX-0967	2020-06-18 Email from Druley to Close re Natera Nnounces First Patient Enrollments in both	ARCHER01138001	403, A, C, H, IO, LK, NP, R		
PTX-0968	2020-09-03 Email from Pointer to Stahl re Natera Receives Final Medicare Coverage for its Signatera MRD Test in Stage II-III Colorectal Cancer	ARCHER01154220	403, A, C, H, IO, LK, NP, R		
PTX-0969	2019-03-21 Email from Stahl to Doshi re BMS/ArcherDx Timelines for CLIA Validation & Personalized Panel Cost Estimate	ARCHER01170227-ARCHER01170231	403, A, C, H, IO, LK, NP, R		
PTX-0970	2020-09-04 Email from Israyelyan to Druley re Natera Receives LCD From Palmetto for Signatera MRD Test in Colorectal Cancer Patients	ARCHER01189051	403, A, C, H, IO, LK, NP, R		
PTX-0971	2019-10-17 Email from Casey to Macaulay re Recap of NTRA's Q3 Earnings Call	ARCHER01215986-ARCHER01215988	403, A, C, H, IO, LK, NP, R		
PTX-0972	2020-08-26 Email from Stahl to Close re Natera's Signatera Test Receives CE Mark	ARCHER01169600	403, A, C, H, IO, LK, NP, R		
PTX-0973	2020-08-03 Email from Rougier to Fugere re Signatera Publication in Nature Cancer	ARCHER01215446-ARCHER01215447	403, A, C, H, IO, LK, NP, R		
PTX-0974	2020-06-11 Email from Nishiguchi to Adams re commercial Due Diligence Follow-up	ARCHER01139504-ARCHER01139506	403, A, C, H, IO, LK, NP, R		
PTX-0975	2020-05-15 Email from Israyelyan to Burn re Got the draft?	ARCHER01202187-ARCHER01202190	403, A, C, H, IO, LK, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-0976	2020-01-15 Email from Godin-Heymann to Burn re Breakthrough Device Designation and Documents for PMDA	ARCHER01217396	403, A, C, H, IO, LK, NP, R		
PTX-0977	2020-01-19 Email from Druley to Stahl re Follow up on meeting with Nick Turner	ARCHER01194644-ARCHER01194646	403, A, C, H, IO, LK, NP, R		
PTX-0978	2020-10-09 Email from Harris to Garcia-Murillas re Data from first upload breast cancer project ICR	ARCHER01199126-ARCHER01199139	403, A, C, H, IO, LK, NP, R		
PTX-0979	2020-05-24 Email from Druley to Israyelyan re Invitation to participate in ArcherDX Cancer Research Grant	ARCHER01197763-ARCHER01197765	403, A, C, H, IO, LK, NP, R		
PTX-0980	2020-06-04 ArcherDX & Novartis Follow Up STRATAFIDE Meeting Presentation	ARCHER01139507-ARCHER01139527	403, A, C, H, IO, LK, NP, R		
PTX-0981	GMSKO0001: Reagents for Archer MET ctDNA Application for Raw materials form	ARCHER01154777-ARCHER01154780	403, A, C, H, IO, LK, NP, R		
PTX-0982	2020-04-02 Archer Memo to Galderisi re MET AMP Test on the RevealDX Assay for ctDNA component configuration change	ARCHER01142525-ARCHER01142526	403, A, C, H, IO, LK, NP, R		
PTX-0983	2020-10-01 Email from Patel to Robinson re Monthly IVD Forecast Review	ARCHER01139116	403, A, C, H, IO, LK, NP, R		
PTX-0984	Draft Clinical Evidence re FusionPlex (RNA), VariantPlex (DNA and ctDNA), and proposed IVD Stratafide	ARCHER01144890-ARCHER01144898	403, A, C, H, IO, LK, NP, R		
PTX-0985	Spreadsheet: Stratafide, Myeloid, PCM forecasting 100120 NKP	ARCHER01139117	403, A, C, H, IO, LK, NP, R		
PTX-0986	2020-06-19 PCM Roadmap Alignment Presentation	ARCHER01138080-ARCHER01138168	403, A, C, H, IO, LK, NP, R		
PTX-0987	GMSKO0001: Reagents for Archer MET ctDNA Application for Raw materials form	ARCHER01156301-ARCHER01156304	403, A, C, H, IO, LK, NP, R		
PTX-0988	2020-03-04 Personalized Cancer Monitoring (PCM) Development Plan Presentation	ARCHER01146590-ARCHER01146633	403, A, C, H, IO, LK, NP, R		
PTX-0989	2020-07-28 PCM Roadmap Overview Presentation	ARCHER01136947-ARCHER01136978	403, A, C, H, IO, LK, NP, R		
PTX-0990	2020-08-28 ArcherDX GSK Pre-Meeting Questions and ArcherDX Answers	ARCHER01162487-ARCHER01162494	403, A, C, H, IO, LK, NP, R		
PTX-0991	Allagash - Compiled Business Section	ARCHER01145116-ARCHER01145176	403, A, C, H, IO, LK, NP, R		
PTX-0992	June 2020 Allagash Analyst Day Presentation	ARCHER01138890-ARCHER01138933	403, A, C, H, IO, LK, NP, R		
PTX-0993	ArcherDx Stratafide DX Response to Request for Additional Information M200014/M003 (RFAI 005)	ARCHER01137827-ARCHER01137844	403, A, C, H, IO, LK, NP, R		
PTX-0994	2019-03-22 Email from Stefanelli to Schurr re AZ proposal and RFP	ARCHER01170256-ARCHER01170257	403, A, C, H, IO, LK, NP, R		
PTX-0995	2019-10-04 Draft Project Agreement No. 2 Pursuant to Master CDX Agreement between ArcherDX and Merck	ARCHER01177561-ARCHER01177594	403, A, C, H, IO, LK, NP, R		
PTX-0996	Reveal ctDNA™ 28 Kit for Illumina FS12.E	ARCHER01158682-ARCHER01158684	403, A, C, H, IO, LK, NP, R		
PTX-0997	Archer-MRD-002 Summary Technical File	ARCHER01137370-ARCHER01137425	403, A, C, H, IO, LK, NP, R		
PTX-0998	P2809182 Protocol DHF-08181.A	ARCHER01166576-ARCHER01166586	403, A, C, H, IO, LK, NP, R		
PTX-0999	SOW for Celegene DLBCL study	ARCHER01217731-ARCHER01217748	403, A, C, H, IO, LK, NP, R		
PTX-1000	FusionPlex Weill Cornell Sarcoma Product Insert LA776.0	ARCHER01193747-ARCHER01193748	403, A, C, H, IO, LK, NP, R		
PTX-1001	May 2020 Allagash Analyst Day Presentation	ARCHER01140461-ARCHER01140641	403, A, C, H, IO, LK, NP, R		
PTX-1002	Spreadsheet: STRATAFIDE COGS - pharma pricing	ARCHER01141228	403, A, C, H, IO, LK, NP, R		
PTX-1003	2019-11-04 Archer Stratafide launch support and PCM strategy—PCM Strategy Workshop	ARCHER01156894-ARCHER01156967	403, A, C, H, IO, LK, NP, R		
PTX-1004	Spreadsheet: Allagash - Updated Backup Tracker	ARCHER01198253	403, A, C, H, IO, LK, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1005	2019-11-25 ArcherDX US Stratafide launch support - Summary of Findings	ARCHER01158388-ARCHER01158479	403, A, C, H, IO, LK, NP, R		
PTX-1006	2019-12-31 Premier Statement of Work presented to ArcherDX	ARCHER01193315-ARCHER01193332	403, A, C, H, IO, LK, NP, R		
PTX-1007	MET Variant Test RevealDX Assay System for RNA Instructions for Use IFU-GMSK0002.4	ARCHER01156356-ARCHER01156387	403, A, C, H, IO, LK, NP, R		
PTX-1008	2019-12-05 Email from Flynn to Myers re Piper/NTRA: Update from the 31st Annual Healthcare Conference	ARCHER01211392-ARCHER01211393	403, A, C, H, IO, LK, NP, R		
PTX-1009	Spreadsheet: MA Team PCM Grid Oct2020 SN[1]	ARCHER01200853	403, A, C, H, IO, LK, NP, R		
PTX-1010	February 2017 Archer Management Presentation	ARCHER01208779-ARCHER01208852	403, A, C, H, IO, LK, NP, R		
PTX-1011	ArcherDX MET Variant IVD	ARCHER01200839-ARCHER01200849	403, A, C, H, IO, LK, NP, R		
PTX-1012	2018-04-25 Schedule 3 ArcherDX and TRACER Collaboration Overview	ARCHER01183131-ARCHER01183137	403, A, C, H, IO, LK, NP, R		
PTX-1013	2020-07-21 Archer Medical Affairs Overview Presentation	ARCHER01201185-ARCHER01201205	403, A, C, H, IO, LK, NP, R		
PTX-1014	ArcherDX DLBCL Assay Product Insert	ARCHER01172623-ARCHER01172647	403, A, C, H, IO, LK, NP, R		
PTX-1015	Intentionally Left Blank		E		
PTX-1016	Spreadsheet: CDx Revenue and Forecasting Report	ARCHER01211644	403, A, C, H, IO, LK, NP, R		
PTX-1017	2020-04-20 Archer April Training Session Presentation	ARCHER01203175-ARCHER01203227	403, A, C, H, IO, LK, NP, R		
PTX-1018	ArcherDX Debio FGFR Presubmission Package	ARCHER01175268-ARCHER01175315	403, A, C, H, IO, LK, NP, R		
PTX-1019	2020-06-23 ctDNA MRD Market Landscape & Strategy Proposal	ARCHER01215804-ARCHER01215834	403, A, C, H, IO, LK, NP, R		
PTX-1020	2020-03-04 Personalized Cancer Monitoring (PCM) Development and Commercialization Plan Presentation	ARCHER01203788-ARCHER01203867	403, A, C, H, IO, LK, NP, R		
PTX-1021	December 2019 Archer Jeffries Discussion Materials Presentation	ARCHER01211800-ARCHER01211853	403, A, C, H, IO, LK, NP, R		
PTX-1022	Spreadsheet: Sales Report - Profiling Products and Services	ARCHER01210381	403, A, C, H, IO, LK, NP, R		
PTX-1023	Spreadsheet: Sales Forecast FY2020 - Products & Services	ARCHER01216134	403, A, C, H, IO, LK, NP, R		
PTX-1024	2020-07-28 Evaluating the Efficacy and Feasibility of Implementing Next Generation Sequencing for Multiple Cancers in Academic and Community Hospitals Training and Evaluation Protocol	ARCHER01199228-ARCHER01199238	403, A, C, H, IO, LK, NP, R		
PTX-1025	Archer Met AMP Test on the RevealDX Assay System for ctDNA Instructions for Use IFU-GMSK0010.1	ARCHER01202373-ARCHER01202398	403, A, C, H, IO, LK, NP, R		
PTX-1026	Spreadsheet: Sales Report- Profiling Products and Services- 08-07-2020	ARCHER01210461	403, A, C, H, IO, LK, NP, R		
PTX-1027	Spreadsheet: Sales Report- Profiling Products and Services- 08-21-2020	ARCHER01210312	403, A, C, H, IO, LK, NP, R		
PTX-1028	Spreadsheet: Sales Report- Profiling Products and Services- 08-14-2020	ARCHER01210389	403, A, C, H, IO, LK, NP, R		
PTX-1029	Archer-MRD-002 Request for Study Risk Determination: MeRmaid 2	ARCHER01143886-ARCHER01143903	403, A, C, H, IO, LK, NP, R		
PTX-1030	Archer Original investigational Device Exemption Application ArcherDX MET Variant Test on the RevealDX Assay	ARCHER01124667-ARCHER01124795	403, A, C, H, IO, LK, NP, R		
PTX-1031	ArcherDX Stratafide Companion Diagnostic Overview Presentation	ARCHER01198411-ARCHER01198428	403, A, C, H, IO, LK, NP, R		
PTX-1032	Spreadsheet: ArcherDX OPEX Report- Sep 2020 - 09OCT2020	ARCHER01138477	403, A, C, H, IO, LK, NP, R		
PTX-1033	2019-10-08 Email from Creech to Myers re Agenda items	ARCHER01228915	403, A, C, H, IO, LK, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1034	2020-05-26 Email from Kafka to Stahl re ArcherDX Announces Strategic Collaboration with AstraZeneca	ARCHER01256119	403, A, C, H, IO, LK, NP, R		
PTX-1035	2018-01-19 Email from Alexander to Myers re We need t use quality to our advantage	ARCHER01223340-ARCHER01223341	403, A, C, H, IO, LK, NP, R		
PTX-1036	2019-12-04 Email from Flynn to Myers re ArcherDX Introduction	ARCHER01219977	403, A, C, H, IO, LK, NP, R		
PTX-1037	2016-01-21 Email from Zlatkovsky to Stahl re Natera quote and purchase	ARCHER01276144-ARCHER01276145	403, A, C, H, IO, LK, NP, R		
PTX-1038	2019-02-25 Email from Lefkoff to Myers re Audit Committee Discussion Materials	ARCHER01234979	403, A, C, H, IO, LK, NP, R		
PTX-1039	2019-07-16 Universal IVD/CDx Strategy Update Summer Sales Meeting Presentation	ARCHER01231606-ARCHER01231626	403, A, C, H, IO, LK, NP, R		
PTX-1040	2019-09-27 Archer Overview HealthQuest Presentation	ARCHER01228797-ARCHER01228856	403, A, C, H, IO, LK, NP, R		
PTX-1041	2013-11-01 Archer Multiplex PCR (AMP) Technology Presentation	ARCHER01225183-ARCHER01225201	403, A, C, H, IO, LK, NP, R		
PTX-1042	Anchored multiplex PCR for targeted next-generation sequencing	ARCHER01264733-ARCHER01264753	403, A, C, H, IO, LK, NP, R		
PTX-1043	Spreadsheet: GSP Template Microcost Model Combined	ARCHER01223520	403, A, C, H, IO, LK, NP, R		
PTX-1044	2020-07-07 Craig-Hallum Natera Company Report	ARCHER01252269-ARCHER01252277	403, A, C, H, IO, LK, NP, R		
PTX-1045	June 2020 Archer Presentation	ARCHER01257965-ARCHER01257982	403, A, C, H, IO, LK, NP, R		
PTX-1046	2020-06-23 JPM Life Sciences CEO/CFO Conference Call Series: Guardant Health (GH)	ARCHER01254744-ARCHER01254771	403, A, C, H, IO, LK, NP, R		
PTX-1047	2020-06-23 JPM Life Sciences CEO/CFO Conference Call Series: Guardant Health (GH)	ARCHER01255217-ARCHER01255244	403, A, C, H, IO, LK, NP, R		
PTX-1048	Spreadsheet: 2020-04-28 Archer- Commercial Revenue and Forecast details	ARCHER01259097	403, A, C, H, IO, LK, NP, R		
PTX-1049	2018-04-30 European Dx testing landscape: NGS adoption, testing volumes and lab behavior	ARCHER01221942-ARCHER01222073	403, A, C, H, IO, LK, NP, R		
PTX-1050	June 2020 Archer Discussion materials Process update	ARCHER01255341-ARCHER01255364	403, A, C, H, IO, LK, NP, R		
PTX-1051	Spreadsheet: 2020-06-19 Sales Report- Profiling Products and Services	ARCHER01255382	403, A, C, H, IO, LK, NP, R		
PTX-1052	Spreadsheet: 2020-06-05 Sales Report- Profiling Products and Services	ARCHER01255562	403, A, C, H, IO, LK, NP, R		
PTX-1053	Spreadsheet: 2020-07-02 Sales Report- Profiling Products and Services	ARCHER01254672	403, A, C, H, IO, LK, NP, R		
PTX-1054	Spreadsheet: 2020-09-23 Cash Forecast	ARCHER01256588	403, A, C, H, IO, LK, NP, R		
PTX-1055	March 2019 ArcherDX Overview Presentation	ARCHER01233651-ARCHER01233706	403, A, C, H, IO, LK, NP, R		
PTX-1056	2020-08-19 UBS Life Sciences & Diagnostic Tools 2020 UBS Genomics 2.0: The Ascent Continues, Opportunities Abound	ARCHER01264462-ARCHER01264512	403, A, C, H, IO, LK, NP, R		
PTX-1057	Spreadsheet: 2020-07-10 Sales Report- Profiling Products and Services	ARCHER01254613	403, A, C, H, IO, LK, NP, R		
PTX-1058	Spreadsheet: Archer- 2018 thru Q1 2020 Revenue by Customer and Rev Category	ARCHER01259112	403, A, C, H, IO, LK, NP, R		
PTX-1059	Spreadsheet: 2020-09-28 Sales Report - Profiling Products and Services	ARCHER01255372	403, A, C, H, IO, LK, NP, R		
PTX-1060	Spreadsheet: 2020-09-21 Sales Report - Profiling Products and Services	ARCHER01259224	403, A, C, H, IO, LK, NP, R		
PTX-1061	2020-04-20 Project Alaska Discussion Materials Presentation	ARCHER01258187-ARCHER01258226	403, A, C, H, IO, LK, NP, R		
PTX-1062	Spreadsheet: 2020-06-26 Sales Report- Profiling Products and Services	ARCHER01254860	403, A, C, H, IO, LK, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1063	Decembe 2018 Archer Global Market Development Strategy Presentation	ARCHER01235820-ARCHER01236000	403, A, C, H, IO, LK, NP, R		
PTX-1064	2020-09-18 Cowen Ahead of the Curve Executive Brief	ARCHER01259228-ARCHER01259238	403, A, C, H, IO, LK, NP, R		
PTX-1065	Spreadsheet: 2020-06-12 Sales Report- Profiling Products and Services	ARCHER01255517	403, A, C, H, IO, LK, NP, R		
PTX-1066	Spreadsheet: 2020-09-21 Sales Report - Profiling Products and Services	ARCHER01258848	403, A, C, H, IO, LK, NP, R		
PTX-1067	ArcherDX Publication Summary	ARCHER01255147-ARCHER01255150	403, A, C, H, IO, LK, NP, R		
PTX-1068	2018-09-20 Immuno-oncology (IO) TMB insight Workshop Landscape Findings — Oncologist Feedback Presentation	ARCHER01238535-ARCHER01238627	403, A, C, H, IO, LK, NP, R		
PTX-1069	2019-11-13 Archer Stratafide launch support and PCM strategy — Draft Findings and Recommendations	ARCHER01277921-ARCHER01278016	403, A, C, H, IO, LK, NP, R		
PTX-1070	2019-11-25 ArcherDX US Stratafide launch support -Summary of Findings	ARCHER01278017-ARCHER01278108	403, A, C, H, IO, LK, NP, R		
PTX-1071	Spreadsheet: Service Pricing	ARCHER01230077	403, A, C, H, IO, LK, NP, R		
PTX-1072	Spreadsheet: 2015-09-25 GSP Micro-cost Summary Data	ARCHER01230063	403, A, C, H, IO, LK, NP, R		
PTX-1073	Spreadsheet: RFS165, Cost Estimate Calculator	ARCHER01230076	403, A, C, H, IO, LK, NP, R		
PTX-1074	Marino, Patricia (2018) Cost of cancer diagnosis using next-generation sequencing targeted gene panels in routine practice: a nationwide French study, European Journal of Human Genetics	ARCHER01230065-ARCHER01230074	403, A, C, H, IO, LK, NP, R		
PTX-1075	Sabatini, Linda (2016) Genomic Sequencing Procedure Microcosting Analysis and Health Economic Cost-Impact Analysis, The Journal of Molecular Diagnostics Vol. 18	ARCHER01230053-ARCHER01230062	403, A, C, H, IO, LK, NP, R		
PTX-1076	Spreadsheet: Revenue & Reactions Calculation Master file- FY 2019	ARCHER01240658	403, A, C, H, IO, LK, NP, R		
PTX-1077	2017-09-20 Email from GenomeWeb to Myers re Daily News: Natera, Aarhus University to Collaborate on Liquid Biopsy Study for Bladder Cancer	ARCHER01284976-ARCHER01284978	403, A, C, H, IO, LK, NP, R		
PTX-1078	2018-04-23 Email from Stahl to Abbosh re Competition	ARCHER01319468	403, A, C, H, IO, LK, NP, R		
PTX-1079	2019-02-08 Email from Russel to Casey re Natera (TRACERx competitor)	ARCHER01311915	403, A, C, H, IO, LK, NP, R		
PTX-1080	2020-07-15 Email from Zhang to Browning re BMS ArcherDX Strategy meeting Notes	ARCHER01327061-ARCHER01327062	403, A, C, H, IO, LK, NP, R		
PTX-1081	2017-09-18 Email from Stahl to Abbosh re Archer/Crick Institute	ARCHER01320423-ARCHER01320425	403, A, C, H, IO, LK, NP, R		
PTX-1082	2018-04-03 Email from Stahl to Abbosh re BMS	ARCHER01319674-ARCHER01319675	403, A, C, H, IO, LK, NP, R		
PTX-1083	2020-09-10 Email from Myer to Berlin re Response Needed: BR.31 issue, BAM files	ARCHER01345861-ARCHER01345864	403, A, C, H, IO, LK, NP, R		
PTX-1084	2020-04-22 Attachment B Form of Project Schedule Project Schedule No. [3b] Master Collaboration Agreement between ArcherDX and AstraZeneca	ARCHER01385852-ARCHER01385868	403, A, C, H, IO, LK, NP, R		
PTX-1085	2020-07-01 Email from Stefanelli to Robell re PMV Pharma	ARCHER01384813	403, A, C, H, IO, LK, NP, R		
PTX-1086	Integration Planning Roadmap Commercial Presentation	ARCHER01292999-ARCHER01293000	403, A, C, H, IO, LK, NP, R		
PTX-1087	2019-06-20 Email from Wegner to Walters re [confluence] Custom Development Projects LCI FP Pan Heme Supplementary Module	ARCHER01417225-ARCHER01417227	403, A, C, H, IO, LK, NP, R		
PTX-1088	Spreadsheet: 2020-07-24 Sales Report- Profiling Products and Services	ARCHER01293071	403, A, C, H, IO, LK, NP, R		
PTX-1089	2019-04-30 Email from Stahl to Swanton re Collaborations	ARCHER01318235-ARCHER01318236	403, A, C, H, IO, LK, NP, R		
PTX-1090	2020-07-01 GNE PCM Questions-NCSLC Draft	ARCHER01296081-ARCHER01296092	403, A, C, H, IO, LK, NP, R		
PTX-1091	Spreadsheet: 2020-07-24 Sales Report- Profiling Products and Services	ARCHER01293399	403, A, C, H, IO, LK, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1092	ArcherDX ASC 606 Analysis - Companion Diagnostics Contract with Ayala	ARCHER01301674-ARCHER01301682	403, A, C, H, IO, LK, NP, R		
PTX-1093	Spreadsheet: 2020-06-12 Sales Report- Profiling Products and Services	ARCHER01299755	403, A, C, H, IO, LK, NP, R		
PTX-1094	2020-05-31 Draft Project Team Charter AZ SOW1	ARCHER01296598-ARCHER01296602	403, A, C, H, IO, LK, NP, R		
PTX-1095	2017-12-06 Schedule A-1 Statement of Work 3 between Merck and Archer	ARCHER01306451-ARCHER01306456	403, A, C, H, IO, LK, NP, R		
PTX-1096	2017-12-06 Schedule A-2 Statement of Work 2 between Merck and Archer	ARCHER01306457-ARCHER01306466	403, A, C, H, IO, LK, NP, R		
PTX-1097	Spreadsheet: 2020-09-14 Sales Report - Profiling Products and Services	ARCHER01291232	403, A, C, H, IO, LK, NP, R		
PTX-1098	Spreadsheet: 2020-06-07 Archer PL Forecast Model - PCM model	ARCHER01301906	403, A, C, H, IO, LK, NP, R		
PTX-1099	2020-04-14 Email from Chapman to Soufan re Product Training - ArcherMET	ARCHER01286569-ARCHER01286570	403, A, C, H, IO, LK, NP, R		
PTX-1100	2020-04-14 Archer MET Assay System for RNA and ctDNA Presentation	ARCHER01286571-ARCHER01286599	403, A, C, H, IO, LK, NP, R		
PTX-1101	Spreadsheet: 2020-05-08 Sales Report- Profiling Products and Services	ARCHER01302295	403, A, C, H, IO, LK, NP, R		
PTX-1102	VariantPlex CTL Product Insert LA574.B	ARCHER01357184-ARCHER01357186	403, A, C, H, IO, LK, NP, R		
PTX-1103	ArcherDX ASC 606 Analysis - Companion Diagnostics Contract with Bayer Consumer Care AG	ARCHER01301653-ARCHER01301660	403, A, C, H, IO, LK, NP, R		
PTX-1104	ArcherDX ASC 606 Analysis - Companion Diagnostics Contract with AstraZeneca AB	ARCHER01301633-ARCHER01301642	403, A, C, H, IO, LK, NP, R		
PTX-1105	Cheng, Ju (2019) Clinical Validation of a Cell-Free DNA Gene Panel, The Journal of Molecular Diagnostics Vol. 21	ARCHER01296446-ARCHER01296459	403, A, C, H, IO, LK, NP, R		
PTX-1106	Spreadsheet: Proposal comparison	ARCHER01347223	403, A, C, H, IO, LK, NP, R		
PTX-1107	Spreadsheet: Apollo Support OPEX	ARCHER01305290	403, A, C, H, IO, LK, NP, R		
PTX-1108	Invitae ArcherDX- Revenue Presentation	ARCHER01304224-ARCHER01304241	403, A, C, H, IO, LK, NP, R		
PTX-1109	Spreadsheet: 2020-05-22 Sales Report- Profiling Products and Services	ARCHER01300162	403, A, C, H, IO, LK, NP, R		
PTX-1110	2020-09-08 AstraZeneca Technical and laboratory operations questionnaire ArcherDx Stratagide Assay	ARCHER01288599-ARCHER01288633	403, A, C, H, IO, LK, NP, R		
PTX-1111	Spreadsheet: 2020-05-08 Sales Report- Profiling Products and Services	ARCHER01286235	403, A, C, H, IO, LK, NP, R		
PTX-1112	ArcherDX 2019 Fixed Price List APM066	ARCHER01289657-ARCHER01289662	403, A, C, H, IO, LK, NP, R		
PTX-1113	2020-04-23 Email from Langer to Russell re Chord review of Accrued Royalties, Security Deposits and Intangibles as of December 31 2019	ARCHER01301504	403, A, C, H, IO, LK, NP, R		
PTX-1114	2020-04-22 Chord Review of Accrued Royalties as of December 31, 2019	ARCHER01301505	403, A, C, H, IO, LK, NP, R		
PTX-1115	2020-04-22 Chord Review of Intangible Assets as of December 31, 2019	ARCHER01301509	403, A, C, H, IO, LK, NP, R		
PTX-1116	Spreadsheet: L1-160000-191500 Patents & Intangible Amort 2019 - Chord adjusted	ARCHER01301510	403, A, C, H, IO, LK, NP, R		
PTX-1117	Spreadsheet: Latest GL rec - 239000 Accrued Royalties 2020 - Chord reviewed	ARCHER01301506	403, A, C, H, IO, LK, NP, R		
PTX-1118	2020-07-20 July Training Session Presentation	ARCHER01293410-ARCHER01293462	403, A, C, H, IO, LK, NP, R		
PTX-1119	Spreadsheet: 2020-05-15 Sales Report- Profiling Products and Services	ARCHER01302163	403, A, C, H, IO, LK, NP, R		
PTX-1120	Archer VariantPlex™ CFTR Kit for Illumina FS23.A	ARCHER01322593-ARCHER01322596	403, A, C, H, IO, LK, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1121	Spreadsheet: 2020-09-08 Sales Report - Profiling Products and Services	ARCHER01291199	403, A, C, H, IO, LK, NP, R		
PTX-1122	Spreadsheet: Apollo Support Follow up Combined (Priority) v7	ARCHER01305917	403, A, C, H, IO, LK, NP, R		
PTX-1123	Spreadsheet: 2020-05-15 Sales Report- Profiling Products and Services	ARCHER01289637	403, A, C, H, IO, LK, NP, R		
PTX-1124	2020-09-23 Audacity ArcherDX Architecture + Nomenclature Validation Research Brief R0.03	ARCHER01297155-ARCHER01297162	403, A, C, H, IO, LK, NP, R		
PTX-1125	2017-12-06 Schedule A-2 Statement of Work 2 between Merck and Archer	ARCHER01306432-ARCHER01306441	403, A, C, H, IO, LK, NP, R		
PTX-1126	2017-12-06 Schedule A-1 Statement of Work 3 between Merck and Archer	ARCHER01306442-ARCHER01306447	403, A, C, H, IO, LK, NP, R		
PTX-1127	2018-06-20 Schedule A-1 Statement of Work 1 between Merck KGaA and ArcherDX	ARCHER01306424-ARCHER01306431	403, A, C, H, IO, LK, NP, R		
PTX-1128	2016-09-22 Archer IUO Development 2016 Q3 Presentation	ARCHER01379292-ARCHER01379316	403, A, C, H, IO, LK, NP, R		
PTX-1129	2020-04-20 Oracle Capital ArcherDX Final Earnout Report	ARCHER01302377-ARCHER01302391	403, A, C, H, IO, LK, NP, R		
PTX-1130	Archer FY' 2020 ArcherDX Sales Goal Sheet (Browning 2020)	ARCHER01386337-ARCHER01386343	403, A, C, H, IO, LK, NP, R		
PTX-1131	Archer FY' 2020 ArcherDX Sales Goal Sheet (Montez 2020)	ARCHER01386349-ARCHER01386353	403, A, C, H, IO, LK, NP, R		
PTX-1132	Archer FY' 2020 ArcherDX Sales Goal Sheet (Meyer JM 2020)	ARCHER01386344-ARCHER01386348	403, A, C, H, IO, LK, NP, R		
PTX-1133	Draft Development Plan 1 Astrazeneca Minimal Residual Disease (MRD) Clinical Trial Assay Project Work Plan	ARCHER01314494-ARCHER01314511	403, A, C, H, IO, LK, NP, R		
PTX-1134	2020-09-29 Audacity ArcherDX IVD + RUO Mood boards	ARCHER01294919-ARCHER01294927	403, A, C, H, IO, LK, NP, R		
PTX-1135	2020-04-18 Archer Marketing Overview Presentation	ARCHER01285988-ARCHER01286030	403, A, C, H, IO, LK, NP, R		
PTX-1136	2020-07-20 Scope of Work #1 between Gritstone Oncology and ArcherDX	ARCHER01385920-ARCHER01385929	403, A, C, H, IO, LK, NP, R		
PTX-1137	2020-08-19 Email from Chapman to Flynn re Slides for today's call with NVTA re: branding	ARCHER01292894	403, A, C, H, IO, LK, NP, R		
PTX-1138	FusionPlex Expanded Sarcoma Product Insert	ARCHER01327628-ARCHER01327634	403, A, C, H, IO, LK, NP, R		
PTX-1139	2019-09-26 Non-Binding Term Sheet to ArcherDX / AstraZeneca UK Ltd Master Collaboration Agreement	ARCHER01317480-ARCHER01317504	403, A, C, H, IO, LK, NP, R		
PTX-1140	2020-07-08 Audacity ArcherDX Brand Architecture + Nomenclature Recommendations	ARCHER01297449-ARCHER01297494	403, A, C, H, IO, LK, NP, R		
PTX-1141	2020-08-18 ArcherDX Presentation	ARCHER01292895-ARCHER01292927	403, A, C, H, IO, LK, NP, R		
PTX-1142	Spreadsheet: 2020-07-31 Sales Report- Profiling Products and Services	ARCHER01293256	403, A, C, H, IO, LK, NP, R		
PTX-1143	Spreadsheet: 2020-05-15 Sales Report- Profiling Products and Services	ARCHER01300194	403, A, C, H, IO, LK, NP, R		
PTX-1144	2020-05-18 Allagash Analyst Day Presentation	ARCHER01301980-ARCHER01302160	403, A, C, H, IO, LK, NP, R		
PTX-1145	2020-09-21 September Marketing Training Presentation	ARCHER01298109-ARCHER01298169	403, A, C, H, IO, LK, NP, R		
PTX-1146	Archer Statement of Work - CDX Development Plan 1 MCLA-128 NRG1	ARCHER01314001-ARCHER01314021	403, A, C, H, IO, LK, NP, R		
PTX-1147	2020-08-12 Oracle Capital ArcherDX Final Report	ARCHER01307575-ARCHER01307606	403, A, C, H, IO, LK, NP, R		
PTX-1148	2018-09-27 Project Agreement No. 1 Pursuant to Master CDX Agreement between ArcherDX and Merck	ARCHER01301568-ARCHER01301597	403, A, C, H, IO, LK, NP, R		
PTX-1149	Spreadsheet: Apollo Follow up	ARCHER01307342	403, A, C, H, IO, LK, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1150	VariantPlex Core Myeloid Product Insert LA571.B	ARCHER01349405-ARCHER01349409	403, A, C, H, IO, LK, NP, R		
PTX-1151	Archer VariantPlex Somatic Reagents for Illumina Protocol LA560.B	ARCHER01349410-ARCHER01349428	403, A, C, H, IO, LK, NP, R		
PTX-1152	ArcherDX Democratizing Precision Oncology Presentation	ARCHER01292624-ARCHER01292687	403, A, C, H, IO, LK, NP, R		
PTX-1153	2020-09-03 Natera Receives LCD From Palmetto for Signatera MRD Test in Colorectal Cancer Patients, GenomeWeb	ARCHER01307158-ARCHER01307159	403, A, C, H, IO, LK, NP, R		
PTX-1154	Spreadsheet: 2020-05-08 Sales Report- Profiling Products and Services	ARCHER01328247	403, A, C, H, IO, LK, NP, R		
PTX-1155	Spreadsheet: Royalty Debt & Interest obligation Support	ARCHER01308186	403, A, C, H, IO, LK, NP, R		
PTX-1156	Spreadsheet: 2020-09-30 PO report	ARCHER01310490	403, A, C, H, IO, LK, NP, R		
PTX-1157	2020-08-11 ArcherDx SEC 10-Q	ARCHER01303356-ARCHER01303409	403, A, C, H, IO, LK, NP, R		
PTX-1158	2019-09-12 Individual Project Agreement No. 3 between ArcherDX and Illumina	ARCHER01299760-ARCHER01299795	403, A, C, H, IO, LK, NP, R		
PTX-1159	Non-Binding Draft: Term Sheet Planning Document for ArcherDx and Apollomics INC. MET Inhibitor Drug / CDx Assay Development and Distribution Agreement	ARCHER01400444-ARCHER01400446	403, A, C, H, IO, LK, NP, R		
PTX-1160	Spreadsheet: Kit supply Status SA0204 by account Allocation Tiers v3 pipeline + open orders	ARCHER01396411	403, A, C, H, IO, LK, NP, R		
PTX-1161	2018-12-18 Schedule A-3 Statement of Work between Ayala and ArcherDX	ARCHER01401480-ARCHER01401484	403, A, C, H, IO, LK, NP, R		
PTX-1162	2019-04-28 Email from Cerney to Fugere re Natera ctDNA competitive information	ARCHER01402543	403, A, C, H, IO, LK, NP, R		
PTX-1163	2020-06-30 Personalized Cancer Monitoring (PCM) Presentation	ARCHER01327371-ARCHER01327406	403, A, C, H, IO, LK, NP, R		
PTX-1164	2020-04-22 Attachment B Form of Project Schedule Project Schedule No. [3a] Master Collaboration Agreement between ArcherDX and AstraZeneca	ARCHER01355486-ARCHER01355504	403, A, C, H, IO, LK, NP, R		
PTX-1165	2019-04-09 Signatera Optimizing oncology clinical trials with a custom-designed ctDNA assay for MRD and molecular monitoring Presentation	ARCHER01402544-ARCHER01402594	403, A, C, H, IO, LK, NP, R		
PTX-1166	2020-04-27 BMS Lung, Melanoma, Bladder MRD Internal PAC Meeting Presentation	ARCHER01385754-ARCHER01385765	403, A, C, H, IO, LK, NP, R		
PTX-1167	Spreadsheet: 2020-05-01 Sales Report- Profiling Products and Services	ARCHER01385749	403, A, C, H, IO, LK, NP, R		
PTX-1168	FusionPlex Lung Product Insert LA671.B	ARCHER01405662-ARCHER01405664	403, A, C, H, IO, LK, NP, R		
PTX-1169	2019-09-10 Email from Nishiguchi to Walters re quotation request/ DB0392 SNPID Supplementary Module	ARCHER01415863-ARCHER01415864	403, A, C, H, IO, LK, NP, R		
PTX-1170	2020-03-23 Master Development and Commercialization Agreement for Vitrakvi between Bayer and ArcherDx	ARCHER01396779-ARCHER01396836	403, A, C, H, IO, LK, NP, R		
PTX-1171	2018-11-21 Archer Agreement: KITE-Chang-112118 between ArcherDx and Kite Pharma	ARCHER01404739	403, A, C, H, IO, LK, NP, R		
PTX-1172	VariantPlex Solid Tumor Product Insert LA561.A	ARCHER01415871-ARCHER01415874	403, A, C, H, IO, LK, NP, R		
PTX-1173	2020-04-03 Email from Johnson to White re VariantPlex OncoClinicas Solid Tumor V2 Draft CS and QC Report (Bulk Material)	ARCHER01413928	403, A, C, H, IO, LK, NP, R		
PTX-1174	2018-11-13 Email from Burrow to Siok re Papers/References for CRISPR, CAR-T site integration, BMC error correction	ARCHER01405522	403, A, C, H, IO, LK, NP, R		
PTX-1175	VariantPlex-HGC Labcorp DNA Leukemia Product Insert	ARCHER01417660-ARCHER01417661	403, A, C, H, IO, LK, NP, R		
PTX-1176	2020-03-27 QC Report, Gene-Specific Primers QCR2020030331.4	ARCHER01413953-ARCHER01413961	403, A, C, H, IO, LK, NP, R		
PTX-1177	2019-02-12 FusionPlex CaseStudies Presentation	ARCHER01418588-ARCHER01418612	403, A, C, H, IO, LK, NP, R		
PTX-1178	2020-07-06 Personalized Cancer Monitoring (PCM) Presentation	ARCHER01327158-ARCHER01327190	403, A, C, H, IO, LK, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1179	FusionPlex Pan Solid Tumor Product Insert LA776.0	ARCHER01412293-ARCHER01412294	403, A, C, H, IO, LK, NP, R		
PTX-1180	2020-06-05 ArcherDx S-1	ARCHER01312840-ARCHER01313101	403, A, C, H, IO, LK, NP, R		
PTX-1181	2020-08-13 ArcherDx SEC 10-Q	ARCHER01309243-ARCHER01309297	403, A, C, H, IO, LK, NP, R		
PTX-1182	VariantPlex Solid Tumor Product Insert LA561.A	ARCHER01320576-ARCHER01320579	403, A, C, H, IO, LK, NP, R		
PTX-1183	Spreadsheet: Apollo Support Follow up Combined (Priority)	ARCHER01307107	403, A, C, H, IO, LK, NP, R		
PTX-1184	2019-03-22 Archer Analysis 6.0 User Manual	ARCHER01343612-ARCHER01343759	403, A, C, H, IO, LK, NP, R		
PTX-1185	Spreadsheet: 2021-04-12 ACS Archer Assay Totals	ARCHER00090929	403, A, C, H, IO, LK, NP, R		
PTX-1186	MET Variant Test on the RevealDX Assay System for RNA IFU-GMSK0002.5	ARCHER00090832-ARCHER00090869	403, A, C, H, IO, LK, NP, R		
PTX-1187	Spreadsheet: Boulder Product Sales & COGS - Q4'20 recast	ARCHER00090591	403, A, C, H, IO, LK, NP, R		
PTX-1188	2020-11-18 Email from Simons to McKeough re Wednesday's Invitae & Relevant Industry News	ARCHER01421192-ARCHER01421197	403, A, C, H, IO, LK, NP, R		
PTX-1189	2020-12-02 Email from Druley to Stefanelli re Merck US - Archer - MRD pilot for RCC	ARCHER01427574-ARCHER01427577	403, A, C, H, IO, LK, NP, R		
PTX-1190	2020-12-09 Email from Druley to Rougier-Champman re Two things	ARCHER01428095-ARCHER01428096	403, A, C, H, IO, LK, NP, R		
PTX-1191	2021-02-08 Email from Pointer to Close re Additions to deck	ARCHER01420742	403, A, C, H, IO, LK, NP, R		
PTX-1192	2020-12-02 Email from Druley to Kuraishy re Merk US - Archer - MRD pilot for RCC	ARCHER01427159-ARCHER01427165	403, A, C, H, IO, LK, NP, R		
PTX-1193	Signatera A personalized, tumor-informed approach to detect molecular residual disease with high sensitivity and specificity	ARCHER01532602-ARCHER01532609	403, A, C, H, IO, LK, NP, R		
PTX-1194	CDX Development Plan Proposal re Genentech PCM CDx between Invitae and Archer	ARCHER01463240-ARCHER01463259	403, A, C, H, IO, LK, NP, R		
PTX-1195	Archer Personalized Cancer Monitoring (PCM) Presentation	ARCHER01503592-ARCHER01503623	403, A, C, H, IO, LK, NP, R		
PTX-1196	Draft Project Schedule 1 Tepotinib c-Met CDX Project Work Plan between ArcherDx and Merck	ARCHER01504997-ARCHER01505015	403, A, C, H, IO, LK, NP, R		
PTX-1197	2020-11-03 Email from Hoenes to Wright re Genentech follow up	ARCHER01456571-ARCHER01456574	403, A, C, H, IO, LK, NP, R		
PTX-1198	2020-07-13 PCM Roadmap Update (ELT) Presentation	ARCHER01467156-ARCHER01467180	403, A, C, H, IO, LK, NP, R		
PTX-1199	Invitae Genosity Presentation	ARCHER01521024-ARCHER01521025	403, A, C, H, IO, LK, NP, R		
PTX-1200	2020-12-16 Email from Druley to McMahon re Natera	ARCHER01428227	403, A, C, H, IO, LK, NP, R		
PTX-1201	Stratafide Dx Commercialization Plan DHF17-A-1-3	ARCHER01467835-ARCHER01467845	403, A, C, H, IO, LK, NP, R		
PTX-1202	Archer LiquidPlex Protocol for Illumina LA090.1	ARCHER01526461-ARCHER01526480	403, A, C, H, IO, LK, NP, R		
PTX-1203	2020-12-01 ArcherDx/Invitae Milestones Stratafide and PCM Presentation	ARCHER01421073-ARCHER01421090	403, A, C, H, IO, LK, NP, R		
PTX-1204	Archer Personalized Cancer Monitoring (PCM) Presentation	ARCHER01507128-ARCHER01507159	403, A, C, H, IO, LK, NP, R		
PTX-1205	Anchored Multiplex PCR Compiled Business Section Overview	ARCHER01486963-ARCHER01487019	403, A, C, H, IO, LK, NP, R		
PTX-1206	2018-04-17 Master CDX Agreement between Merck and ArcherDX	ARCHER01504906-ARCHER01504977	403, A, C, H, IO, LK, NP, R		
PTX-1207	2020-12-17 Amendment #3 to the Project Agreement No. 1 between ArcherDX and Merck	ARCHER01465044-ARCHER01465054	403, A, C, H, IO, LK, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1208	2020-06-30 Archer Personalized cancer Monitoring (PCM) Presentation	ARCHER01466654-ARCHER01466686	403, A, C, H, IO, LK, NP, R		
PTX-1209	Exhibit A - IVD Plan #2 IVD Test Kit for Minimal Residual Disease	ARCHER01519552-ARCHER01519557	403, A, C, H, IO, LK, NP, R		
PTX-1210	2020-10-05 Archer Zentalis PCM CDX Development Proposed - Non-Binding Draft Proposal and Pricing	ARCHER01520942-ARCHER01520958	403, A, C, H, IO, LK, NP, R		
PTX-1211	2020-10-14 Email from Peterson to Massaro re Invitae; Aiming High with Archer Dx, But Valuation Reflects Heightened Expectations	ARCHER01435105-ARCHER01435108	403, A, C, H, IO, LK, NP, R		
PTX-1212	2020-03-04 PCM development plan working session Presentation	ARCHER01471520-ARCHER01471534	403, A, C, H, IO, LK, NP, R		
PTX-1213	Archer Personalized Cancer Monitoring (PCM) Presentation	ARCHER01502243-ARCHER01502275	403, A, C, H, IO, LK, NP, R		
PTX-1214	Draft Project Schedule 1 Debio 1347 GFFR1/2/3 Fusion CDX Prject Work Plan between ArcherDx and Debiopharm	ARCHER01500948-ARCHER01500963	403, A, C, H, IO, LK, NP, R		
PTX-1215	VariantPlex Universal Solid Tumor Product Insert	ARCHER01520554-ARCHER01520557	403, A, C, H, IO, LK, NP, R		
PTX-1216	FusionPlex Expanded Sarcoma for Illumina Product Insert	ARCHER01524583-ARCHER01524590	403, A, C, H, IO, LK, NP, R		
PTX-1217	Spreadsheet: September 2020 ArcherDX Stratafide CDx Assay Information Package	ARCHER01524341	403, A, C, H, IO, LK, NP, R		
PTX-1218	VariantPlex UVM Heme Product Insert	ARCHER01524465-ARCHER01524466	403, A, C, H, IO, LK, NP, R		
PTX-1219	Archer Product Plan ,Personalized Cancer Monitoring (PCM™)	ARCHER01531709-ARCHER01531799	403, A, C, H, IO, LK, NP, R		
PTX-1220	2020-08-05 Pharma CDx BD/AM Project Review	ARCHER01459431-ARCHER01459467	403, A, C, H, IO, LK, NP, R		
PTX-1221	2020-10-30 Invitae ArcherDX Liquid Biopsy Solutions: LiquidPlex and Personalized Cancer Monitoring (PCM) Presentation	ARCHER01471401-ARCHER01471438	403, A, C, H, IO, LK, NP, R		
PTX-1222	Spreadsheet: 2017-09-28 Inventory report	ARCHER01508196	403, A, C, H, IO, LK, NP, R		
PTX-1223	VariantPlex AML Focus v2 Product Insert LA770.0	ARCHER01524615-ARCHER01524617	403, A, C, H, IO, LK, NP, R		
PTX-1224	2020-11-12 Archer Pricing Update: Stratafide and PCM Presentation	ARCHER01422403-ARCHER01422424	403, A, C, H, IO, LK, NP, R		
PTX-1225	Archer PCM/MRD Assay Overview Presentation	ARCHER01422262-ARCHER01422275	403, A, C, H, IO, LK, NP, R		
PTX-1226	2021-02-01 Email from Northcutt to Walters re P200043 on Hold Pending Your Response	ARCHER01421648-ARCHER01421649	403, A, C, H, IO, LK, NP, R		
PTX-1227	LiquidPlex SeraCare Gmini Product Insert LA771.1	ARCHER01524511-ARCHER01524512	403, A, C, H, IO, LK, NP, R		
PTX-1228	2021-01-11 Invitae Personal Cancer Monitoring (PCM) Overview Presentation	ARCHER01425421-ARCHER01425441	403, A, C, H, IO, LK, NP, R		
PTX-1229	2020-10-15 Laboratory Services Statement of Work #3 between ArcherDX and Genosity	ARCHER01457188-ARCHER01457194	403, A, C, H, IO, LK, NP, R		
PTX-1230	LiquidPlex CHOP Neuroblastoma Product Insert LA771.1	ARCHER01427471-ARCHER01427473	403, A, C, H, IO, LK, NP, R		
PTX-1231	2020-11-20 Invitae From genetics, health Boulder Ventures Investor Call Presentation	ARCHER01433950-ARCHER01433970	403, A, C, H, IO, LK, NP, R		
PTX-1232	Invitae Archer Anchored Multiplex PCR (AMP) Powering Comprehensive Genomic Profiling, Enabling Innovation Presenation	ARCHER01427818-ARCHER01427858	403, A, C, H, IO, LK, NP, R		
PTX-1233	2021-02-04 Invitae Personal Cancer Monitoring (PCM) Overview Presentation	ARCHER01425955-ARCHER01425974	403, A, C, H, IO, LK, NP, R		
PTX-1234	2020-07-13 IDT Specification Sheet, Order No. 16922507	ARCHER01422389-ARCHER01422401	403, A, C, H, IO, LK, NP, R		
PTX-1235	2021-01-26 Invitae PCM Intensive Presentation	ARCHER01457308-ARCHER01457338	403, A, C, H, IO, LK, NP, R		
PTX-1236	Spreadsheet: ArcherDX- variable S&M spend for new revenue- FY2019 data	ARCHER01443944	403, A, C, H, IO, LK, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1237	2020-09-24 IVD Test Kit Development Agreement between Illumina and ArcherDX	ARCHER01446412-ARCHER01446475	403, A, C, H, IO, LK, NP, R		
PTX-1238	Spreadsheet: 2020-10-12 Sales Report - Profiling Products and Services	ARCHER01434649	403, A, C, H, IO, LK, NP, R		
PTX-1239	Spreadsheet: 2020-11-09 Sales Report - Profiling Products and Services	ARCHER01433442	403, A, C, H, IO, LK, NP, R		
PTX-1240	2020-11-10 Archer Personal Cancer Monitoring (PCM) Pricing ELT Review Presentation	ARCHER01445442-ARCHER01445469	403, A, C, H, IO, LK, NP, R		
PTX-1241	2020-06-19 Archer PCM Roadmap Alignment Presentation	ARCHER01467235-ARCHER01467323	403, A, C, H, IO, LK, NP, R		
PTX-1242	2020-10-15 Laboratory Services Statement of Work #3 between ArcherDX and Genosity	ARCHER01454960-ARCHER01454966	403, A, C, H, IO, LK, NP, R		
PTX-1243	Spreadsheet: 2020-12-14 Sales Report - Profiling Products and Services	ARCHER01441309	403, A, C, H, IO, LK, NP, R		
PTX-1244	Spreadsheet: 2020-12-07 Sales Report - Profiling Products and Services	ARCHER01431182	403, A, C, H, IO, LK, NP, R		
PTX-1245	Spreadsheet: Sales Report - Profiling Products and Services - 2020	ARCHER01431260	403, A, C, H, IO, LK, NP, R		
PTX-1246	2020-11-06 Archer Personal Cancer Monitoring (PCM) Pricing ELT Review Presentation	ARCHER01445363-ARCHER01445386	403, A, C, H, IO, LK, NP, R		
PTX-1247	2020-11-11 Archer Personal Cancer Monitoring (PCM) Pricing ELT Review Presentation	ARCHER01438769-ARCHER01438781	403, A, C, H, IO, LK, NP, R		
PTX-1248	Spreadsheet: 2020-11-16 Sales Report - Profiling Products and Services	ARCHER01433419	403, A, C, H, IO, LK, NP, R		
PTX-1249	Spreadsheet: 2020-10-19 Sales Report - Profiling Products and Services	ARCHER01434485	403, A, C, H, IO, LK, NP, R		
PTX-1250	March 2020 Archer/Invitae Collaboration Discussion Presentation	ARCHER01479770-ARCHER01479820	403, A, C, H, IO, LK, NP, R		
PTX-1251	Spreadsheet: 2020-12-14 Sales Report - Profiling Products and Services	ARCHER01433709	403, A, C, H, IO, LK, NP, R		
PTX-1252	Spreadsheet: 2020-12-21 Sales Report - Profiling Products and Services	ARCHER01434279	403, A, C, H, IO, LK, NP, R		
PTX-1253	Spreadsheet: 2020-12-16 Archer 2021 Operational Plan workbook	ARCHER01444558	403, A, C, H, IO, LK, NP, R		
PTX-1254	Archer PCM Overview Presentation	ARCHER01448099-ARCHER01448117	403, A, C, H, IO, LK, NP, R		
PTX-1255	2020-11-12 Archer Pricing Update: Stratafide and PCM Presentation	ARCHER01440145-ARCHER01440166	403, A, C, H, IO, LK, NP, R		
PTX-1256	2020-07-13 Archer H1FY20 Quarterly Business Reviews (QBR) Presentation	ARCHER01435240-ARCHER01435400	403, A, C, H, IO, LK, NP, R		
PTX-1257	2020-10-21 Archer Partnership Discussion - China Presentation	ARCHER01447925-ARCHER01447976	403, A, C, H, IO, LK, NP, R		
PTX-1258	Spreadsheet: Archer Reaction and Testing Volume + ASP forecast - v23 - Nov Actuals v1	ARCHER01444366	403, A, C, H, IO, LK, NP, R		
PTX-1259	FusionPlex Expanded Sarcoma Product Insert	ARCHER01447603-ARCHER01447610	403, A, C, H, IO, LK, NP, R		
PTX-1260	2020-11-10 Archer PCM Pricing ELT Review Presentation	ARCHER01438342-ARCHER01438373	403, A, C, H, IO, LK, NP, R		
PTX-1261	Spreadsheet: 2020-05-15 Sales Report- Profiling Products and Services	ARCHER01481535	403, A, C, H, IO, LK, NP, R		
PTX-1262	VariantPlex VLL BRCamm Product Insert LA770.0	ARCHER01449117-ARCHER01449119	403, A, C, H, IO, LK, NP, R		
PTX-1263	Spreadsheet: 2020-12-28 Sales Report - Profiling Products and Services	ARCHER01431268	403, A, C, H, IO, LK, NP, R		
PTX-1264	Spreadsheet: 2020-11-23 Sales Report - Profiling Products and Services	ARCHER01433851	403, A, C, H, IO, LK, NP, R		
PTX-1265	2020-11-10 Archer Personal Cancer Monitoring (PCM) Pricing ELT Review Presentation	ARCHER01439264-ARCHER01439291	403, A, C, H, IO, LK, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1266	2020-10-05 Archer Zentalis PCM CDX Development Proposed - Non-Binding Draft Proposal and Pricing	ARCHER01448827-ARCHER01448844	403, A, C, H, IO, LK, NP, R		
PTX-1267	2020-10-30 Invitae ArcherDX Liquid Biopsy Solutions: LiquidPlex and Personalized Cancer Monitoring (PCM) Presentation	ARCHER01430291-ARCHER01430326	403, A, C, H, IO, LK, NP, R		
PTX-1268	VariantPlex John Hunter Solid Tumor Focus LA770.0	ARCHER01449847-ARCHER01449849	403, A, C, H, IO, LK, NP, R		
PTX-1269	2020-09-21 Archer September Marketing Training Presentation	ARCHER01469032-ARCHER01469091	403, A, C, H, IO, LK, NP, R		
PTX-1270	2020-11-13 Email from Fogg to Russel re Sales Forecast File	ARCHER01444684	403, A, C, H, IO, LK, NP, R		
PTX-1271	Spreadsheet: 2020-05-15 Sales Report- Profiling Products and Services	ARCHER01481543	403, A, C, H, IO, LK, NP, R		
PTX-1272	2020-11-30 Invitae Technical Accounting Memorandum re Illumina Contract - Technology Access Fee	ARCHER01442115-ARCHER01442138	403, A, C, H, IO, LK, NP, R		
PTX-1273	Spreadsheet: 2020-10-23 Sales Commission Calculation Master file FY2020	ARCHER01446830	403, A, C, H, IO, LK, NP, R		
PTX-1274	Spreadsheet: 2020-12-31 Q420 Cash Flow Revenue	ARCHER01444173	403, A, C, H, IO, LK, NP, R		
PTX-1275	Spreadsheet: 2020-11-12 Archer Reaction and Testing Volume + ASP forecast	ARCHER01446714	403, A, C, H, IO, LK, NP, R		
PTX-1276	Spreadsheet: 2021-01-14 December Reporting to NVT A	ARCHER01441293	403, A, C, H, IO, LK, NP, R		
PTX-1277	2020-11-10 PCM Pricing ELT Review Presentation	ARCHER01438415-ARCHER01438444	403, A, C, H, IO, LK, NP, R		
PTX-1278	Spreadsheet: 2020-11-02 Sales Report - Profiling Products and Services	ARCHER01434426	403, A, C, H, IO, LK, NP, R		
PTX-1279	Spreadsheet: 2020-05-15 Sales Report- Profiling Products and Services	ARCHER01481539	403, A, C, H, IO, LK, NP, R		
PTX-1280	Spreadsheet: 2020-05-13 CDx Revenue Actuals and Forecasting Report	ARCHER01481540	403, A, C, H, IO, LK, NP, R		
PTX-1281	FusionPlex CHU Lyon Pan Solid Tumor Sarcoma LA776.0	ARCHER01448313-ARCHER01448314	403, A, C, H, IO, LK, NP, R		
PTX-1282	2020-11-17 Email from Fogg to Wright re Archer Invitae Development Milestone Hit for MiSeqDx IVD	ARCHER01444710-ARCHER01444716	403, A, C, H, IO, LK, NP, R		
PTX-1283	2020-08-25 Invitae S4	ARCHER01473286-ARCHER01473653	403, A, C, H, IO, LK, NP, R		
PTX-1284	2020-09-08 Archer Stratafide Dx: Launch Readiness Review 2 (LRR2) Presentation	ARCHER01472337-ARCHER01472521	403, A, C, H, IO, LK, NP, R		
PTX-1285	February 2021 Invitae Regulatory and Quality Update: Distributed Products	ARCHER01518874-ARCHER01518949	403, A, C, H, IO, LK, NP, R		
PTX-1286	Spreadsheet: Q319 Royalties Becton	ARCHER01485217	403, A, C, H, IO, LK, NP, R		
PTX-1287	Spreadsheet: Q419 Royalties Becton	ARCHER01485218	403, A, C, H, IO, LK, NP, R		
PTX-1288	Spreadsheet: Archer Reaction and Testing Volume + ASP forecast - Dec Actuals	ARCHER01444695	403, A, C, H, IO, LK, NP, R		
PTX-1289	2020-09-24 IVD Test Kit Development Agreement between Illumina and ArcherDX	ARCHER01444717-ARCHER01444780	403, A, C, H, IO, LK, NP, R		
PTX-1290	Spreadsheet: 2020-11-30 Sales Report - Profiling Products and Services	ARCHER01431688	403, A, C, H, IO, LK, NP, R		
PTX-1291	Spreadsheet: 2020-10-26 Sales Report - Profiling Products and Services	ARCHER01435044	403, A, C, H, IO, LK, NP, R		
PTX-1292	Spreadsheet: 2020-05-15 Sales Report- Profiling Products and Services	ARCHER01481531	403, A, C, H, IO, LK, NP, R		
PTX-1293	Spreadsheet: 2020-11-04 Eldar Request inventory to COGS vs Lab Supplies	ARCHER01446845	403, A, C, H, IO, LK, NP, R		
PTX-1294	2021-01-15 Email from Stefanelli to Rougier-Champman re PCM/Stratafide Pricing follow up	ARCHER01545370-ARCHER01545371	403, A, C, H, IO, LK, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1295	2020-11-30 Email from Druley to Esplin re Biorepository overview	ARCHER01541713-ARCHER01541716	403, A, C, H, IO, LK, NP, R		
PTX-1296	Archer FY' 2020 Sales Goal Sheet (Stefanelli)	ARCHER01566592-ARCHER01566596	403, A, C, H, IO, LK, NP, R		
PTX-1297	2020-03-27 Statement of Work CM274 Bladder Project between Bristol-Myers and ArcherDX	ARCHER01566670-ARCHER01566677	403, A, C, H, IO, LK, NP, R		
PTX-1298	2021 Q1 Diagnostic Strategy Org - Quality	ARCHER01534874	403, A, C, H, IO, LK, NP, R		
PTX-1299	2020-06-19 Individual Project Agreement, Project Title: Stratafide Human Factors Formative Study between ArcherDX and LabCorp	ARCHER01567410-ARCHER01567412	403, A, C, H, IO, LK, NP, R		
PTX-1300	Spreadsheet: 2015-2020 YTD(Sep)	ARCHER01567478	403, A, C, H, IO, LK, NP, R		
PTX-1301	2020-10-13 Email from Meyer to Stefanelli re Jill you have a proposal to review!!!	ARCHER01563368-ARCHER01563372	403, A, C, H, IO, LK, NP, R		
PTX-1302	2020-02-10 Laboratory Services Statement of Work Amendment #1 between ArcherDx and Genosity	ARCHER01576497-ARCHER01576500	403, A, C, H, IO, LK, NP, R		
PTX-1303	2020-03-27 Statement of Work CA209-816 between Bristol-Myers and ArcherDX	ARCHER01577366-ARCHER01577375	403, A, C, H, IO, LK, NP, R		
PTX-1304	2021-02-04 Email from Holwick to Gilbert re PCM LDT impact on CDx proposal	ARCHER01553746-ARCHER01553748	403, A, C, H, IO, LK, NP, R		
PTX-1305	2019-07-24 Statement of Work 2a between AstraZeneca and ArcherDX	ARCHER01577342-ARCHER01577353	403, A, C, H, IO, LK, NP, R		
PTX-1306	2020-06-02 Archer Personalized Cancer Monitoring Competitive Data Presentation	ARCHER01584062-ARCHER01584078	403, A, C, H, IO, LK, NP, R		
PTX-1307	Spreadsheet: 110000 & 115000 AR	ARCHER01585553	403, A, C, H, IO, LK, NP, R		
PTX-1308	2020-03-27 Statement of Work CA209-915 between Bristol-Myers and Archer	ARCHER01577376-ARCHER01577385	403, A, C, H, IO, LK, NP, R		
PTX-1309	2019-07-24 Statement of Work 1 between AstraZeneca and ArcherDX	ARCHER01577329-ARCHER01577341	403, A, C, H, IO, LK, NP, R		
PTX-1310	2019-07-24 Archer Statement of Work 2b between AstraZeneca and ArcherDX	ARCHER01577519-ARCHER01577530	403, A, C, H, IO, LK, NP, R		
PTX-1311	2021-02-18 Speaking Points for Invitae MRD for AstraZeneca Portugal meeting - Julie Meyer	ARCHER01647596-ARCHER01647602	403, A, C, H, IO, LK, NP, R		
PTX-1312	2019-07-24 Statement of Work 2b between AstraZeneca and ArcherDX	ARCHER01577354-ARCHER01577365	403, A, C, H, IO, LK, NP, R		
PTX-1313	VariantPlex Universal Solid Tumor Product Insert LA770.0	ARCHER01654948-ARCHER01654950	403, A, C, H, IO, LK, NP, R		
PTX-1314	December 2018 Archer Differentiation Presentation	ARCHER01635220-ARCHER01635240	403, A, C, H, IO, LK, NP, R		
PTX-1315	2020-04-22 Project Schedule No. 1 Master Collaboration Agreement between AstraZeneca and ArcherDX	ARCHER01577296-ARCHER01577328	403, A, C, H, IO, LK, NP, R		
PTX-1316	VariantPlex CTL Product Insert LA574.B	ARCHER01588691-ARCHER01588693	403, A, C, H, IO, LK, NP, R		
PTX-1317	2021-01-16 Invitae Financial Due Diligence Presentation	ARCHER01567578-ARCHER01567599	403, A, C, H, IO, LK, NP, R		
PTX-1318	2020-07-16 ArcherDX Pharma and Companion Diagnostic Overview Merck Presentation	ARCHER01654078-ARCHER01654114	403, A, C, H, IO, LK, NP, R		
PTX-1319	2019-07-24 Archer Statement of Work 1 between AstraZeneca and ArcherDX	ARCHER01577494-ARCHER01577506	403, A, C, H, IO, LK, NP, R		
PTX-1320	2020-03-06 License Agreement between UCL Business and ArcherDX	ARCHER01577256-ARCHER01577295	403, A, C, H, IO, LK, NP, R		
PTX-1321	2020-05-26 Third Deed of Amendment between University of College London, UCL Business Limited, ArcherDX, The Francis Crick Institute Limited	ARCHER01567867-ARCHER01567885	403, A, C, H, IO, LK, NP, R		
PTX-1322	December 2019 Archer Evercore Thoughts on ArcherDx IPOs	ARCHER01604994-ARCHER01605050	403, A, C, H, IO, LK, NP, R		
PTX-1323	METex14 Test on the RevealDX Assay for ctDNA CS806.1	ARCHER01704966-ARCHER01704990	403, A, C, H, IO, LK, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1324	Spreadsheet: 2019-11-03 Archer PL Forecast Model	ARCHER01633570	403, A, C, H, IO, LK, NP, R		
PTX-1325	2020-09-11 ArcherDX CDx Strategy and MRD Analysis with PCM Presentation	ARCHER01653794-ARCHER01653824	403, A, C, H, IO, LK, NP, R		
PTX-1326	2020-03-31 Archer Project Agreement No. 01 between Bayer and ArcherDX	ARCHER01577548-ARCHER01577574	403, A, C, H, IO, LK, NP, R		
PTX-1327	2020-05-20 Archer Genentech PCM CDX Development Proposal Non-Binding Draft Proposal and Pricing	ARCHER01651396-ARCHER01651411	403, A, C, H, IO, LK, NP, R		
PTX-1328	2019-05-31 Archer Development Plan 1 between Archer and Ayala	ARCHER01648611-ARCHER01648632	403, A, C, H, IO, LK, NP, R		
PTX-1329	2020-09-03 ArcherDX CDx Strategy MRDAnalysis with PCM EISAI Discussion Presentation	ARCHER01649845-ARCHER01649879	403, A, C, H, IO, LK, NP, R		
PTX-1330	Spreadsheet: Archer Reaction and Testing Volume + ASP forecast - Dec Actuals	ARCHER01588241	403, A, C, H, IO, LK, NP, R		
PTX-1331	2021-01-14 Invitae Personalized Cancer Monitoring (PCM) Overview	ARCHER01649563-ARCHER01649612	403, A, C, H, IO, LK, NP, R		
PTX-1332	2020-05-20 Archer CDX Development Plan Proposal Non-Binding Draft Proposal and Pricing between ArcherDX and Genentech	ARCHER01651377-ARCHER01651395	403, A, C, H, IO, LK, NP, R		
PTX-1333	STRATAFIDE DNA Instructions for Use IFU-GMSK0003.0	ARCHER01711407-ARCHER01711436	403, A, C, H, IO, LK, NP, R		
PTX-1334	Spreadsheet: 2020-12-15 je detail pivot NVTA	ARCHER01588240	403, A, C, H, IO, LK, NP, R		
PTX-1335	Spreadsheet: 2020-11-20 je detail pivot P&L.xlsx	ARCHER01587726	403, A, C, H, IO, LK, NP, R		
PTX-1336	2019-08-15 ArcherDX CDx Companion Diagnostics Presentation	ARCHER01649613-ARCHER01649631	403, A, C, H, IO, LK, NP, R		
PTX-1337	2020-07-30 ArcherDX Personal Cancer Monitoring (PCM) Overview Presentation	ARCHER01649418-ARCHER01649459	403, A, C, H, IO, LK, NP, R		
PTX-1338	2021-03-10 Invitae Partnership Programs for AstraZeneca Presentation	ARCHER01650859-ARCHER01650935	403, A, C, H, IO, LK, NP, R		
PTX-1339	2021-02-17 Invitae MRD for AstraZeneca Portugal Presentation	ARCHER01647457-ARCHER01647521	403, A, C, H, IO, LK, NP, R		
PTX-1340	2020-06-05 AstraZeneca Clinical Study Protocol, Durvalumab D910MC00001	ARCHER01648355-ARCHER01648553	403, A, C, H, IO, LK, NP, R		
PTX-1341	U.S. Patent No. 10,017,810 (Iafrate)	ARCHER01668165-ARCHER01668215	A		
PTX-1342	2020-07-30 ArcherDX Personal Cancer Monitoring (PCM) Overview Presentation	ARCHER01743537-ARCHER01743577	403, A, C, H, IO, LK, NP, R		
PTX-1343	Spreadsheet: Archer Reaction and Testing Volume + ASP forecast - Dec Actuals v3-Final by countru	ARCHER01638464	403, A, C, H, IO, LK, NP, R		
PTX-1344	Archer Performance Evaluation Plan (Mermaid-1) TF0005 Archer-MRD-002	ARCHER01698583-ARCHER01698613	403, A, C, H, IO, LK, NP, R		
PTX-1345	2021-02-08 Archer - Inbound Material Transfer Agreement and Outbound Data Agreement between ArcherDX and IRCCS Regina Elena National Cancer Institute	ARCHER01704128-ARCHER01704135	403, A, C, H, IO, LK, NP, R		
PTX-1346	Spreadsheet: 2020-10-05 Product Key	ARCHER01638501	403, A, C, H, IO, LK, NP, R		
PTX-1347	2020-12-15 Pricing Update: PCM Presentation	ARCHER01638369-ARCHER01638405	403, A, C, H, IO, LK, NP, R		
PTX-1348	Spreadsheet: AAU data for Vishal	ARCHER01588333	403, A, C, H, IO, LK, NP, R		
PTX-1349	Spreadsheet: ACS Projects KW	ARCHER01536568	403, A, C, H, IO, LK, NP, R		
PTX-1350	2021-02-08 Material and Deidentified Data Set Transfer Agreement between Cedars-Sinai and ArcherDx	ARCHER01704113-ARCHER01704127	403, A, C, H, IO, LK, NP, R		
PTX-1351	2020-04-22 Attachment B Form of Project Schedule, Project Schedule No. [3a] Master Collaboration Agreement between ArcherDX and AstraZeneca	ARCHER01646345-ARCHER01646362	403, A, C, H, IO, LK, NP, R		
PTX-1352	Spreadsheet: 2020-03-23 Library Sequencing Details	ARCHER01642041	403, A, C, H, IO, LK, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1353	Spreadsheet: 2021-01-21 Sales Commission Calculation Master file FY2020-Q4	ARCHER01634736	403, A, C, H, IO, LK, NP, R		
PTX-1354	Spreadsheet: Archer Reaction and Testing Volume + ASP forecast - Feb '21	ARCHER01638467	403, A, C, H, IO, LK, NP, R		
PTX-1355	2020-03-23 Master IVD Development and Commercialization Agreement for Vitrekvi between Bayer and ArcherDx	ARCHER01646096-ARCHER01646155	403, A, C, H, IO, LK, NP, R		
PTX-1356	Spreadsheet: Archer Reaction and Testing Volume + ASP forecast - Feb '21	ARCHER01638470	403, A, C, H, IO, LK, NP, R		
PTX-1357	Spreadsheet: Archer Reaction and Testing Volume + ASP forecast - Jan '21	ARCHER01638473	403, A, C, H, IO, LK, NP, R		
PTX-1358	Acute Myeloid Leukemia Measurable Residual Disease for DNA Feasibility Study: Sequencing Depth Requirement Protocol PTC0356	ARCHER01702889-ARCHER01702897	403, A, C, H, IO, LK, NP, R		
PTX-1359	2020-09-14 AZ/ArcherDX Joint Steering Committee Presentation	ARCHER01697381-ARCHER01697430	403, A, C, H, IO, LK, NP, R		
PTX-1360	2021-01-21 Email from Fogg to Russell re Genosity Questions for BoD Deck	ARCHER01549755-ARCHER01549756	403, A, C, H, IO, LK, NP, R		
PTX-1361	2019-01-22 Master Product and Services Agreement between Memorial Sloan Kettering Cancer Center and ArcherDx	ARCHER01669126-ARCHER01669146	403, A, C, H, IO, LK, NP, R		
PTX-1362	Cheng, Ju (2019) Clinical Validation of a Cell-Free DNA Gene Panel, The Journal of Molecular Diagnostics Vol. 21	ARCHER01727373-ARCHER01727386	403, A, C, H, IO, LK, NP, R		
PTX-1363	Acute Myeloid Leukemia Measurable Residual Disease for DNA Feasibility Study: Limit of Detection Protocol PTC0354	ARCHER01702880-ARCHER01702888	403, A, C, H, IO, LK, NP, R		
PTX-1364	Spreadsheet: Archer Reaction and Testing Volume + ASP forecast - Feb '21	ARCHER01638469	403, A, C, H, IO, LK, NP, R		
PTX-1365	Archer Product Plan ,Personalized Cancer Monitoring (PCM™)	ARCHER01742145-ARCHER01742240	403, A, C, H, IO, LK, NP, R		
PTX-1366	2019-07-24 Statement of Work 2a between AstraZeneca and ArcherDX	ARCHER01577507-ARCHER01577518	403, A, C, H, IO, LK, NP, R		
PTX-1367	Spreadsheet: Genosity-Spend Summary	ARCHER01549757	403, A, C, H, IO, LK, NP, R		
PTX-1368	Spreadsheet: 2020-12-28 inventory valuation report	ARCHER01639387	403, A, C, H, IO, LK, NP, R		
PTX-1369	2020-12-16 Invitae Pharma Summit #1 Presentation	ARCHER01643851-ARCHER01643893	403, A, C, H, IO, LK, NP, R		
PTX-1370	2020-03-02 Natera FY-19 10k	ARCHER01638089-ARCHER01638240	A		
PTX-1371	2020-12-10 StrataFide assessment questions Amgen Japan	ARCHER01645389-ARCHER01645399	403, A, C, H, IO, LK, NP, R		
PTX-1372	2020-07-07 Archer Statement of Work between Gritstone Oncology and ArcherDX	ARCHER01651688-ARCHER01651696	403, A, C, H, IO, LK, NP, R		
PTX-1373	2020-03-02 Guardant Health FY-19 10k	ARCHER01637377-ARCHER01637545	A		
PTX-1374	2020-07-20 Archer Scope of Work #1 between Gritstone and ArcherDX	ARCHER01651715-ARCHER01651724	403, A, C, H, IO, LK, NP, R		
PTX-1375	2021-03-02 Archer Memorandum re Electronic Signatures per FDA 21 CFR Part 11	ARCHER01684283-ARCHER01684399	403, A, C, H, IO, LK, NP, R		
PTX-1376	2020-09-30 Archer CDX Development Plan Proposal Non-Binding Draft Proposal and Pricing between ArcherDX and H3 Biomedicine	ARCHER01652371-ARCHER01652385	403, A, C, H, IO, LK, NP, R		
PTX-1377	2019-06-04 MET AMP Kit configuration	ARCHER01762738	403, A, C, H, IO, LK, NP, R		
PTX-1378	GSP, VariantPlex Core Myeloid CS567.B	ARCHER01703484-ARCHER01703489	403, A, C, H, IO, LK, NP, R		
PTX-1379	2021-01-13 Email from Russell to Kuraishy re Approval needed on BMS 76K Melanoma SOW	ARCHER01549665	403, A, C, H, IO, LK, NP, R		
PTX-1380	2021-01-27 Invitae-ArcherDX Update: Personalized Cancer Monitoring	ARCHER01652309-ARCHER01652364	403, A, C, H, IO, LK, NP, R		
PTX-1381	Archer METex14 Test on the Archer RevealDX Assay System for RNA Investigational Use Only Validation Study: Single Site Reproducibility R1010181-2	ARCHER01761651-ARCHER01761680	403, A, C, H, IO, LK, NP, R		
PTX-1382	2021-01-13 Laboratory Services Statement of Work between Genosity and ArcherDX	ARCHER01549666-ARCHER01549668	403, A, C, H, IO, LK, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1383	2020-10-16 Archer Pharma update to Invitae Presentation	ARCHER01769357-ARCHER01769377	403, A, C, H, IO, LK, NP, R		
PTX-1384	2020-01-27 Speaking Points for Invitae-GSK PCM Update meeting with GSK	ARCHER01652365-ARCHER01652370	403, A, C, H, IO, LK, NP, R		
PTX-1385	2021-02-02 Email from Kuraishy to Russel re Approval needed for BMS PCM Project with Genosity	ARCHER01549723	403, A, C, H, IO, LK, NP, R		
PTX-1386	2020-12-30 Statement of Work between ArcherDX and Merck	ARCHER01549693-ARCHER01549701	403, A, C, H, IO, LK, NP, R		
PTX-1387	2019-10-15 Statement of Work 76K Melanoma Project between Bristol-Myers and ArcherDX	ARCHER01549654-ARCHER01549662	403, A, C, H, IO, LK, NP, R		
PTX-1388	Attachment A to Agreement No. 1 between ArcherDX and Merck	ARCHER01653565-ARCHER01653606	403, A, C, H, IO, LK, NP, R		
PTX-1389	2020-11-13 Laboratory Services Statement of Work #3 between Genosity and ArcherDX	ARCHER01558139-ARCHER01558145	403, A, C, H, IO, LK, NP, R		
PTX-1390	2020-03-27 Statement of Work CM274 Bladder Project between Bristol-Myers and ArcherDX	ARCHER01549724-ARCHER01549731	403, A, C, H, IO, LK, NP, R		
PTX-1391	2021-01-28 Laboratory Services Statement of Work between Genosity and ArcherDX	ARCHER01549732-ARCHER01549734	403, A, C, H, IO, LK, NP, R		
PTX-1392	Spreadsheet: 2021-02-03 Invitae CDx CTA PCM Revenue Actuals and Forecasting Report	ARCHER01549099	403, A, C, H, IO, LK, NP, R		
PTX-1393	2020-01-08 Archer NGS market overview Presentation	ARCHER01769856-ARCHER01769896	403, A, C, H, IO, LK, NP, R		
PTX-1394	2021-02-22 Janssen Pharmaceuticals - Introduction to the ArcherDx/Invitae PCM Technology	ARCHER01653311-ARCHER01653349	403, A, C, H, IO, LK, NP, R		
PTX-1395	2020-12-07 Email from Browning to Stahl re ArcherDX Genosity SOW for BMS Melanoma Rescue Work	ARCHER01553570	403, A, C, H, IO, LK, NP, R		
PTX-1396	2020-04-22 Redlined Project Schedule No. 1 Master Collaboration Agreement between AstraZeneca and ArcherDX	ARCHER01562005-ARCHER01562029	403, A, C, H, IO, LK, NP, R		
PTX-1397	Archer Personal Cancer Monitoring (PCM) Current RUO Projects Overview and Prioritization Presentation	ARCHER01539895-ARCHER01539903	403, A, C, H, IO, LK, NP, R		
PTX-1398	Spreadsheet: 2020-11-18 Archer Revenue Actuals and Forecasting Report	ARCHER01550488	403, A, C, H, IO, LK, NP, R		
PTX-1399	2020-11-12 Laboratory Services Statement of Work - Amendment #1 between Genosity and ArcherDX	ARCHER01553574-ARCHER01553576	403, A, C, H, IO, LK, NP, R		
PTX-1400	2020-06-01 First Amendment to Statement of Work CA209-915 between Bristol-Myers and ArcherDX	ARCHER01553571-ARCHER01553573	403, A, C, H, IO, LK, NP, R		
PTX-1401	STRATAFIDE logo options_RS	ARCHER01548645-ARCHER01548679	403, A, C, H, IO, LK, NP, R		
PTX-1402	Spreadsheet: Archer Reaction and Testing Volume + ASP forecast - Dec Actuals	ARCHER01638454	403, A, C, H, IO, LK, NP, R		
PTX-1403	2020-10-15 Laboratory Services Statement of Work #3 between ArcherDX and Genosity	ARCHER01552595-ARCHER01552601	403, A, C, H, IO, LK, NP, R		
PTX-1404	Spreadsheet: 2020-11-10 ADT PCM Revenue	ARCHER01551417	403, A, C, H, IO, LK, NP, R		
PTX-1405	2020-10-28 Schedule 1 - Statement of Work 3, Plasma Based MRD Testing in Support of AZ Br.31 Lung Study between AstraZeneca and ArcherDX	ARCHER01550267-ARCHER01550273	403, A, C, H, IO, LK, NP, R		
PTX-1406	Spreadsheet: 2020-11-05 Archer Revenue Actuals and Forecasting Report	ARCHER01550964	403, A, C, H, IO, LK, NP, R		
PTX-1407	Spreadsheet: 2021-01-20 Archer Revenue Actuals and Forecasting Report	ARCHER01544310	403, A, C, H, IO, LK, NP, R		
PTX-1408	2018-12-12 Statement of Work between ArcherDX and Achilles	ARCHER01560666-ARCHER01560673	403, A, C, H, IO, LK, NP, R		
PTX-1409	2020-11-20 Schedule 1 - Statement of Work - Adaura Feasibility between AstraZeneca and ArcherDX	ARCHER01560542-ARCHER01560547	403, A, C, H, IO, LK, NP, R		
PTX-1410	2020-12-23 Genosity Discussion with Invitae Presentation	ARCHER01552552-ARCHER01552590	403, A, C, H, IO, LK, NP, R		
PTX-1411	Spreadsheet: 2021-03-19 Dashboard Sales Tool with Inventory Cost and Margins	ARCHER01638456	403, A, C, H, IO, LK, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1412	Spreadsheet: 2020-12-14 ArcherDX OPEX Report- November 2020	ARCHER01636866	403, A, C, H, IO, LK, NP, R		
PTX-1413	Spreadsheet: 2021-03-09 ArcherDX FEB 2021 FS	ARCHER01588329	403, A, C, H, IO, LK, NP, R		
PTX-1414	2020-03-02 Invitae 10K	ARCHER01584666-ARCHER01584893	A		
PTX-1415	Spreadsheet: Dashboard Sales Tool with Inventory Cost	ARCHER01638459	403, A, C, H, IO, LK, NP, R		
PTX-1416	GSP, VariantPlex CTL CS601.B	ARCHER00078309-ARCHER00078312	403, A, C, H, IO, LK, NP, R		
PTX-1417	VariantPlex Solid Tumor, SK0111 AS-SK0111.B	ARCHER00077958	403, A, C, H, IO, LK, NP, R		
PTX-1418	GSP, VariantPlex Solid Tumor CS600.B	ARCHER00078297-ARCHER00078300	403, A, C, H, IO, LK, NP, R		
PTX-1419	GSP, FusionPlex Oncology Research CS745.A	ARCHER00075712-ARCHER00075716	403, A, C, H, IO, LK, NP, R		
PTX-1420	GSP, VariantPlex Solid Tumor CS600.1	ARCHER00078286-ARCHER00078290	403, A, C, H, IO, LK, NP, R		
PTX-1421	VariantPlex Core Myeloid, SK0121 Assembly Specification AS-SK0121.B	ARCHER00077970	403, A, C, H, IO, LK, NP, R		
PTX-1422	VariantPlex Reagents for Illumina - 16 reactions, SK0096 Certificate of Analysis CS616.B	ARCHER00078318	403, A, C, H, IO, LK, NP, R		
PTX-1423	VariantPlex CTL, SK0112 Assembly Specification AS-SK0112.B	ARCHER00077959	403, A, C, H, IO, LK, NP, R		
PTX-1424	VariantPlex Myeloid Kit, SK0123 Assembly Specification AS-SK0123.B	ARCHER00077973	403, A, C, H, IO, LK, NP, R		
PTX-1425	VariantPlex CFTR, SK0079 Assembly Specification AS-SK0079.B	ARCHER00077952-ARCHER00077953	403, A, C, H, IO, LK, NP, R		
PTX-1426	GSP, FusionPlex Solid Tumor Part Specification CS559.A	ARCHER00075676-ARCHER00075681	403, A, C, H, IO, LK, NP, R		
PTX-1427	GSP, VariantPlex Core Myeloid Component Specification CS567.1	ARCHER00078231-ARCHER00078236	403, A, C, H, IO, LK, NP, R		
PTX-1428	VariantPlex Myeloid Kit - 8 Reactions, SK0123 Certificate of Analysis CS621.A	ARCHER00078320	403, A, C, H, IO, LK, NP, R		
PTX-1429	VariantPlex Reagents, for Illumina HGC, SK0115 AS-SK0115.B	ARCHER00077960-ARCHER00077961	403, A, C, H, IO, LK, NP, R		
PTX-1430	VariantPlex Reagents, for Illumina-HS, SK0117 AS-SK0117.B	ARCHER00077965-ARCHER00077966	403, A, C, H, IO, LK, NP, R		
PTX-1431	GSP, VariantPlex Core Myeloid part Specification CS567.B	ARCHER00078237-ARCHER00078241	403, A, C, H, IO, LK, NP, R		
PTX-1432	Archer Attachment 2 Updated IFU for METvar ctDNA Test Kit	ARCHER00059364-ARCHER00059387	403, A, C, H, IO, LK, NP, R		
PTX-1433	Archer Primers	ARCHER00074567	403, A, C, H, IO, LK, NP, R		
PTX-1434	STRATAFIDE RNA Assay Procedure AP3.1	ARCHER00070742-ARCHER00070774	403, A, C, H, IO, LK, NP, R		
PTX-1435	2021-02-02 Email from Kuraishy to Russel re Approval needed for BMS PCM Project with Genosity	ARCHER01770322-ARCHER01770323	403, A, C, H, IO, LK, NP, R		
PTX-1436	Spreadsheet: 2019-06-26 Reveal Kit Components Hybrid+Production	ARCHER01934496	403, A, C, H, IO, LK, NP, R		
PTX-1437	FY' 2021 ArcherDX Sales Goal Sheet (Stefanelli)	ARCHER01786087-ARCHER01786092	403, A, C, H, IO, LK, NP, R		
PTX-1438	2020-11-17 Invitae Clinical Development and Operations China Site Qualifications update Presentation	ARCHER01860927-ARCHER01860932	403, A, C, H, IO, LK, NP, R		
PTX-1439	2020-10-19 ArcherDX PCM Discussion Presentation	ARCHER01840356-ARCHER01840382	403, A, C, H, IO, LK, NP, R		
PTX-1440	2020-03-06 ArcherDX invoice #1219	ARCHER01816200	403, A, C, H, IO, LK, NP, R		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1441	2020-05-26 Third Deed of Amendment between University of College London, UCL Business Limited, ArcherDX, The Francis Crick Institute Limited	ARCHER01787333-ARCHER01787351	403, A, C, H, IO, LK, NP, R		
PTX-1442	2016-05-16 Second Amendment to Confidentiality Agreement between Illumina and ArcherDX	ARCHER01838002-ARCHER01838003	403, A, C, H, IO, LK, NP, R		
PTX-1443	2020-03-17 Exhibit to Master Lab Service Provider Agreement CC-90009-AML-002-Arm A between ArcherDX and Celgene Corporation	ARCHER01843108-ARCHER01843115	403, A, C, H, IO, LK, NP, R		
PTX-1444	Spreadsheet: PSP - Mermaid SOW2a	ARCHER01838692	403, A, C, H, IO, LK, NP, R		
PTX-1445	Spreadsheet: Base Case- Archer 2021 Revenue Forecast (NVTa Q4 Recast Base)	ARCHER01838651	403, A, C, H, IO, LK, NP, R		
PTX-1446	Reveal ctDNA™ 28 Kit for Illumina Finished Specification FS12.E	ARCHER01846226-ARCHER01846228	403, A, C, H, IO, LK, NP, R		
PTX-1447	Spreadsheet: ArcherMET ctDNA Equivalency Data Aggregation for B150 Move	ARCHER01910507	403, A, C, H, IO, LK, NP, R		
PTX-1448	Spreadsheet: 2020-06-07 Project Apollo Model	ARCHER01809701	403, A, C, H, IO, LK, NP, R		
PTX-1449	QC Report, Kit Level, ArcherMet ctDNA Assay S41-W13-F1	ARCHER01911488-ARCHER01911491	403, A, C, H, IO, LK, NP, R		
PTX-1450	Spreadsheet: 2021-01-18 ADX-20-0027 BR.31 WES and MRD Master File	ARCHER01860789	403, A, C, H, IO, LK, NP, R		
PTX-1451	Spreadsheet: 2020-06-06 Project Apollo Technical Diligence	ARCHER01823637	403, A, C, H, IO, LK, NP, R		
PTX-1452	Spreadsheet: PSP - BMS - Melanoma	ARCHER01838689	403, A, C, H, IO, LK, NP, R		
PTX-1453	2018-04-06 Service Provider Agreement between ArcherDX and Celgene	ARCHER01846470-ARCHER01846478	403, A, C, H, IO, LK, NP, R		
PTX-1454	Spreadsheet: PSP - BMS - Lung	ARCHER01838686	403, A, C, H, IO, LK, NP, R		
PTX-1455	2017-08-01 Amendment No. 1 to Companion Diagnostic Initial Agreement between ArcherDX and Celgene	ARCHER01846393-ARCHER01846394	403, A, C, H, IO, LK, NP, R		
PTX-1456	Archer FusionPlex Pan-Heme Kit for Illumina, 8 Reactions Finished Specification, FS07.A	ARCHER01844740-ARCHER01844741	403, A, C, H, IO, LK, NP, R		
PTX-1457	2020-06-18 ArcherDX Enters Collaboration with Bristol Myers Squibb to Apply Personalized Cancer Monitoring (PCM) to Clinical Research	ARCHER01845545-ARCHER01845546	403, A, C, H, IO, LK, NP, R		
PTX-1458	2019-01-11 Shipping Label from ArcherDX to Oncode Scientific	ARCHER01801950-ARCHER01801956	403, A, C, H, IO, LK, NP, R		
PTX-1459	Spreadsheet: ArcherDX 2020-2024 Forecast Model	ARCHER01798733	403, C, R, H, CO, C, A		
PTX-1460	2017-02-16 Archer VariantPlex CFTR Protocol for Illumina	ARCHER01835779-ARCHER01835794	R, 403, H, A		
PTX-1461	2020-01-09 Archer Letter to University College London re Letter of Intent re TRACERx	ARCHER01823428	R, 403, H, A, IO		
PTX-1462	Spreadsheet: 2021-02-24 Invitae CDx CTA PCM Revenue Actuals and Forecasting Report	ARCHER01834930	R, 403, H, CO, C, A		
PTX-1463	Spreadsheet: 2020-06-07 Copy of Project Apollo Model	ARCHER01809700	R, 403, LK, H, CO, C, A		
PTX-1464	2018-08-02 Laboratory Collaboration License Agreement between University College London, UCL Business PLC, ArcherDX, and The Francis Crick Institute Ltd.	ARCHER01846533-ARCHER01846555	R, 403, A, CO, H, A		
PTX-1465	Spreadsheet: 2020-06-07 Project Apollo Model	ARCHER01810136	R, 403, H, CO, C, A		
PTX-1466	ArcherDX AML-MRD SOW, Archer NGS Assay, ASC 606 Analysis, Revenue Recognition	ARCHER01833753-ARCHER01833766	R, 403, H, CO, C, A		
PTX-1467	Spreadsheet: 2021-01-21 Archer Deal Tracker PCM	ARCHER01839281	R, 403, H, CO, C, A		
PTX-1468	2020-02-27 ArcherDx-ILMN JSC Presentation	ARCHER01839391-ARCHER01839404	R, 403, H, CO, A		
PTX-1469	2019-1-01 Draft Companion Diagnostic Initiation Agreement between Bayer and ArcherDX	ARCHER01841320-ARCHER01841338	R, 403, H, CO, A		
PTX-1470	2020-07-06 ArcherDX Clinical Trial Assay for Stratified ctDNA Verification and Validation Study: Reproducibility and Repeatability	ARCHER01880924-ARCHER01880929	R, 403, H, CO, A		
PTX-1471	2020-03-25 ArcherDX Receives Approval for Archer MET Companion Diagnostic for TEPMETKO (Tepotinib) in Advanced Non-Small Cell Lung Cancer in Japan	ARCHER01811782-ARCHER01811793	R, 403, H, A		
PTX-1472	2018-01-21 Archer Letter to University College London re Letter of intent re TRACERx	ARCHER01823362	R, 403, H, A, CO, IO		
PTX-1473	2020-09-17 Archer Invoice INV/2020/2245	ARCHER01834013-ARCHER01834017	R, 403, H, CO		
PTX-1474	2017-08-01 Amendment No. 1 to Companion Diagnostic Initial Agreement between ArcherDX and Celgene	ARCHER01846395-ARCHER01846404	R, 403, H, CO, DE (should be amendment No. 2)		
PTX-1475	ArcherDX Bristol-Myers Squibb (Lung) ASC 606 Analysis, Revenue Recognition	ARCHER01833776-ARCHER01833792	R, 403, H, CO		
PTX-1476	GMSK0011 MET AMP Test on the RevealDX Assay for ctDNA IUO GSPs S19-W33-F9	ARCHER01856464-ARCHER01856474	R, 403, H, A		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1477	Invitae AstraZeneca Alliance Presentation	ARCHER01841220-ARCHER01841231	R, 403, H, A, BE		
PTX-1478	Spreadsheet: 2020-05-15 AZ Forecast Pricing	ARCHER01841137	R, 403, H, A, CO, C		
PTX-1479	Archer METamp Test (ctDNA) on the Archer RevealDX Assay System Technical File	ARCHER01804070-ARCHER01804101	R, 403, LK, H, A, CO		
PTX-1480	Archer Technical Note: The Use of Molecular Barcodes in Anchored Multiplex PCR	ARCHER01907193-ARCHER01907196	R, 403, LK, H, A, CO		
PTX-1481	Archer RevealDX Assay System Orthogonal Method for Analytical Accuracy Q181970 Supplement	ARCHER01845703-ARCHER01845713	R, 403, LK, H, A, CO		
PTX-1482	2020-05-26 ArcherDX Announces Strategic Collaboration with AstraZeneca to Develop Personalized Cancer Monitoring (PCM) Assays for Minimal Residual Disease (MRD)	ARCHER01845603-ARCHER01845604	R, 403, LK, H, A		
PTX-1483	Spreadsheet: Merck Milestone Progress Tracking PA1	ARCHER01869274	R, 403, C, H, A, LK		
PTX-1484	2020-06-09 PCM Strategy Workshop: Pharma PCM Pipeline Summary Presentation	ARCHER01942323-ARCHER01942336	R, 403, C, H, A, LK		
PTX-1485	2020-04-16 Archer Technical Training Stratafide ctDNA Presentation	ARCHER01935850-ARCHER01935902	R, 403, C, H, A, LK, IO		
PTX-1486	Stratafide RNA Data Collection Worksheet AP3-F1	ARCHER01884226-ARCHER01884573	R, 403, C, H, A, LK, IO, CO		
PTX-1487	2020-06-20 Laboratory Services Statement of Work between ArcherDx and Genosity	ARCHER01838737-ARCHER01838739	R, 403, C, CO		
PTX-1488	2019-06-12 Draft Second Deed of Amendment between University College London, UCL Business PLC, ArcherDx, and The Francis Crick Institute Limited	ARCHER01906741-ARCHER01906747	R, 403, C, H, A, LK, BE		
PTX-1489	STRATAFIDE ctDNA BCT Comparison Design & Development Study	ARCHER01875819-ARCHER01875845	R, 403, C, H, A, LK, CO, IO		
PTX-1490	Archer Technical Note: The Use of Molecular Barcodes in Anchored Multiplex PCR	ARCHER01844011-ARCHER01844013	R, 403, C, H, A, LF, LK, IO		
PTX-1491	Spreadsheet: 2021-03-04 Stratafide, Myeloid, PCM forecasting	ARCHER01942676	R, 403, C, H, A, LK		
PTX-1492	Spreadsheet: February 2021 Product Quantities, KPI Metrics	ARCHER01838722	R, 403, C, CO, H, A, LK, CO		
PTX-1493	2020-06-20 Laboratory Services Statement of Work between ArcherDx and Genosity	ARCHER01838734-ARCHER01838736	R, 403, C, CO		
PTX-1494	Spreadsheet: Summarized Libraries DHF Index and Protocol	ARCHER01838919	R, 403, C, H, A, LK, CO		
PTX-1495	Spreadsheet: TCV - KPMG Requested TCV Details	ARCHER01838707	R, 403, C, H, A, LK, CO		
PTX-1496	2020-06-20 Laboratory Services Statement of Work between ArcherDx and Genosity	ARCHER01838740-ARCHER01838742	R, 403, C, CO, DU, CU		
PTX-1497	Spreadsheet: 2020-09-24 TeV Q3 Forecast update	ARCHER01838733	R, 403, C, H, A, LK, CO		
PTX-1498	Spreadsheet: 2021-02-14 Stratafide, Myeloid, PCM forecasting NKP	ARCHER01942670	R, 403, C, H, A, LK, CO		
PTX-1499	Spreadsheet: 2020-03-10 Archer Revenue Scenarios	ARCHER01809133	R, 403, C, H, A, LF, LK, CO		
PTX-1500	2019-04-28 Second Deed of Amendment between University College London, UCL Business PLC, ArcherDx, and The Francis Crick Institute Limited	ARCHER01906748-ARCHER01906756	R, 403, C, H, A, LK, CO, BE		
PTX-1501	2020-02-06 Intellectual Property Strategy	ARCHER01838807-ARCHER01838809	R, 403, C, H, A, LK, CO		
PTX-1502	Spreadsheet: 2021-01-07 Archer Revenue Actuals and Forecasting Report	ARCHER01838719	R, 403, C, H, A, LK, CO		
PTX-1503	2020-10-14 BMS Technical and Clinical Alignment Prospective PCM Development	ARCHER01781164-ARCHER01781187	R, 403, C, H, A, LK, CO		
PTX-1504	Spreadsheet: PSP - Mermaid SOW2b	ARCHER01838694	R, 403, C, H, A, LK, CO		
PTX-1505	Implementation of the Archer VariantPlex Myeloid assay and a custom Archer FusionPlex assay Presentation	ARCHER01907596-ARCHER01907647	R, 403, C, H, A, LK, IO		
PTX-1506	2020-01-10 ArcherDX invoice #1165	ARCHER01812985	R, 403, C, H, A, LK, CO		
PTX-1507	MET Variant Test on the RevealDX Assay System for ctDNA Data Collection Worksheet IFU-GMSK0001-F1.4	ARCHER01867489-ARCHER01867528	R, 403, C, H, A, LK, CO, IO		
PTX-1508	Spreadsheet: 2019-03-12 Archer PL Forecast Model V23- Analyst Call Model	ARCHER01806975	R, 403, C, H, A, LK, CO		
PTX-1509	2018-06-28 Master Laboratory Services Agreement between H3 Biomedicine and ArcherDx	ARCHER00091868-ARCHER00091883	R, 403, C, H, A, LK, CO		
PTX-1510	VariantPlex TP53 Product Insert LA770.0	ARCHER00092137-ARCHER00092138	R, 403, C, H, A, LK		
PTX-1511	FusionPlex CTL Product Insert, LA180.B	ARCHER00092054-ARCHER00092057	R, 403, C, H, A, LK		
PTX-1512	VariantPlex TJH Pancreas Product Insert, LA770.0	ARCHER00092135-ARCHER00092136	R, 403, C, H, A, LK		
PTX-1513	VariantPlex TJH Brain Product Insert, LA770.0	ARCHER00092139-ARCHER00092140	R, 403, C, H, A, LK		
PTX-1514	LiquidPlex SeraCare Gmini Product Insert, LA771.1	ARCHER00092145-ARCHER00092146	R, 403, C, H, A, LK		
PTX-1515	FusionPlex Pan Solid Tumor Product Insert	ARCHER00092155-ARCHER00092161	R, 403, C, H, A, LK		
PTX-1516	Enzymatics Archer ALK, RET, ROS1 Fusion Detection v1 Illumina Platform P/N AK0001-8	ARCHER00091755-ARCHER00091770	R, 403, C, H, A, LK		
PTX-1517	2018-06-29 Work Order No. A-2 Feasibility: Limit of Detection (LOD) and CLIA/CAP Validation between H3 Biomedicine and ArcherDx	ARCHER00091893-ARCHER00091898	R, 403, C, H, A, LK, CO		
PTX-1518	Archer FusionPlex Protocol for Illumina, LA135.1	ARCHER00092011-ARCHER00092036	R, 403, C, H, A, LK		
PTX-1519	Archer LiquidPlex Protocol for Illumina, LA090.2	ARCHER00091947-ARCHER00091968	R, 403, C, H, A, LK		
PTX-1520	VariantPlex SeraCare Custom Heme LA770.0	ARCHER00092141-ARCHER00092142	R, 403, C, H, A, LK		
PTX-1521	FusionPlex TJH CTL Product Insert LA776.0	ARCHER00092151-ARCHER00092152	R, 403, C, H, A, LK		
PTX-1522	Archer VariantPlex Protocol for Illumina LA377.A	ARCHER00092064-ARCHER00092080	R, 403, C, H, A, LK		
PTX-1523	Archer VariantPlex Somatic Protocol for Illumina LA560.B	ARCHER00092100-ARCHER00092119	R, 403, C, H, A, LK		
PTX-1524	Archer VariantPlex HS/HGC Protocol for Illumina LA560.1	ARCHER00092081-ARCHER00092099	R, 403, C, H, A, LK		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1525	2019-10-11 Technology License and Technical Assistance Agreement between Genosity and ArcherDX	ARCHER00092211-ARCHER00092230	R, 403, C, H, A, LK, CO		
PTX-1526	FusionPlex Solid Tumor Product Insert LA179.B	ARCHER00092046-ARCHER00092049	R, 403, C, H, A, LK		
PTX-1527	VariantPlex TJH Custom CTL+SMAD4 Product Insert LA770.0	ARCHER00092133-ARCHER00092134	R, 403, C, H, A, LK		
PTX-1528	Archer Reveal ctDNA Protocol for Illumina LA090.A	ARCHER00091969-ARCHER00091986	R, 403, C, H, A, LK		
PTX-1529	2019-05-28 Co-Marketing and Sales Representation Agreement between Genosity and ArcherDx	ARCHER00091793-ARCHER00091818	R, 403, C, H, A, LK, CO		
PTX-1530	LiquidPlex ctDNA 28 Product Insert LA173.0	ARCHER00092037-ARCHER00092039	R, 403, C, H, A, LK		
PTX-1531	VariantPlex Solid Tumor Product Insert LA561.A	ARCHER00092120-ARCHER00092123	R, 403, C, H, A, LK		
PTX-1532	Spreadsheet: 2017-2021 Product Sales (6 customers)	ARCHER00092170	R, 403, C, H, A, LK, CO		
PTX-1533	Spreadsheet: NovoPiscis ARR Illumina Tm added	ARCHER00091773	R, 403, C, H, A, LK, CO		
PTX-1534	2020-10-09 Email from Lee to Abukhdeir re M200014-M003: Stratafide Interference Studies	ARCHER01950006-ARCHER01950007	R, 403, C, H, A, LK, CO		
PTX-1535	Cancer Monitoring Presentation	ARCHER01947445-ARCHER01947459	R, 403, C, H, A, LK, CO		
PTX-1536	2019-11-09 Email from Druley to Ledford re Meeting with Charlie Swanton yesterday.	ARCHER01960284-ARCHER01960286	R, 403, C, H, A, LK, CO, IO		
PTX-1537	2020-08-18 Email from Rondot to Competitive Intelligence re Genosity CLIA approval announcement	ARCHER01970669	R, 403, C, H, A, LK		
PTX-1538	2020-05-18 Email from Druley to Tillson re ION - Stratafide Day 1 Laboratory? (Assistance for Invitae)	ARCHER01979430-ARCHER01979431	R, 403, C, H, A, LK, CO, IO		
PTX-1539	2021-01-05 Invitae Collaboration opportunities - University of Colorado Presentation	ARCHER02001917-ARCHER02001934	R, 403, C, H, A, LK		
PTX-1540	2020-11-19 Research and Development, Version 01	ARCHER02002311-ARCHER02002313	R, 403, C, H, A, LK, CO		
PTX-1541	2021-01-13 Invitae Archer software portfolio Product Boot Camp Presentation	ARCHER01996605-ARCHER01996629	R, 403, C, H, A, LK, CO, IO		
PTX-1542	Iron Maiden: Comprehensive molecular Profiling for Solid Tumors Presentation	ARCHER01998721-ARCHER01998727	R, 403, C, H, A, LK, CO		
PTX-1543	2020-10-14 Invitae Archer Integration Phase II Kick Off Presentation	ARCHER02001507-ARCHER02001536	R, 403, C, H, A, LK, CO		
PTX-1544	2021-01-11 Invitae Oncology Priority 2021 Presentation	ARCHER02003448-ARCHER02003463	R, 403, C, H, A, LK		
PTX-1545	2021-03-04 Invitae PCM Strategy Team Presentation	ARCHER02001377-ARCHER02001402	R, 403, C, H, A, LK, CO		
PTX-1546	2021-01-14 Invitae Archer Commercial Integration Weekly Meeting Presentation	ARCHER02001860-ARCHER02001883	R, 403, C, H, A, LK, CO		
PTX-1547	2021-01-25 Invitae Integrated 2021 Oncology Dev Plan	ARCHER02001403-ARCHER02001438	R, 403, C, H, A, LK, CO		
PTX-1548	Invitae Archer DX LiquidPlex Presentation	ARCHER01997146-ARCHER01997169	R, 403, C, H, A, LK, CO		
PTX-1549	Spreadsheet: Forecasting Grid	ARCHER01998758	R, 403, C, H, A, LK, CO		
PTX-1550	2020-06-22 Archer June Training Session for Channel Partners	ARCHER01997236-ARCHER01997280	R, 403, C, H, A, LK, CO, IO		
PTX-1551	ArcherDX Technical Training Stratafide ctDNA Presentation	ARCHER01998405-ARCHER01998457	R, 403, C, H, A, LK,		
PTX-1552	2021-03-02 Email from Stahl to Browning re Your Approval needed for Merck US PCM pilot pricing	ARCHER02014303	R, 403, C, H, A, LK, CO		
PTX-1553	2020-09-04 Invitae Archer Integration IMO Status Presentation	ARCHER02004010-ARCHER02004012	R, 403, C, H, A, LK, CO		
PTX-1554	2021-02-04 Invitae Laboratory Support Presentation	ARCHER01999539-ARCHER01999546	R, 403, C, H, A, LK, CO		
PTX-1555	March 2021 Invitae Project Grenada Presentation	ARCHER01998919-ARCHER01998937	R, 403, C, H, A, LK, CO		
PTX-1556	May 2020 Schedule A-Feasibility Statement of Work between Mass General Hospital Cancer Center and ArcherDx	ARCHER01993817-ARCHER01993829	R, 403, C, H, A, LK, CO		
PTX-1557	Spreadsheet: AV Table for Def Letter - RNA & ctDNA	ARCHER02051529	R, 403, C, H, A, LK, CO		
PTX-1558	2021-01-14 Invitae STRATAFIDE CTA Pricing Training Presentation	ARCHER01992669-ARCHER01992695	R, 403, C, H, A, LK, CO		
PTX-1559	2021-02-02 Laboratory Services Statement of Work between Genosity and ArcherDX	ARCHER01993838-ARCHER01993841	R, 403, C, CO		
PTX-1560	Stratafide Labeling Requirements Specification DHF17-A-1-11.5	ARCHER02042777-ARCHER02042796	R, 403, C, H, A, LK, CO		
PTX-1561	2020-09-30 Stratafide M200014/M003 Response to Request for Information	ARCHER02071282-ARCHER02071286	R, 403, C, H, A, LK, CO		
PTX-1562	Operations, Quality, Regulatory, Market Access, and Policy Presentation	ARCHER01999950-ARCHER01999959	R, 403, C, H, A, LK, CO		
PTX-1563	Spreadsheet: PCM Project and Forecast Prioritization	ARCHER02000362	R, 403, C, H, A, LK, CO		
PTX-1564	2020-07-01 Invitae Archer Integration Invitae Kick Off Presentation	ARCHER02003973-ARCHER02003991	R, 403, C, H, A, LK, CO		
PTX-1565	2021-01-04 Invitae Pharma Summit #1 Presentation	ARCHER01998861-ARCHER01998911	R, 403, C, H, A, LK		
PTX-1566	Archer STRATAFIDE Product Plan	ARCHER02001262-ARCHER02001349	R, 403, C, H, A, LK		
PTX-1567	Spreadsheet: Milestone Matchup	ARCHER01989080	R, 403, C, H, A, LK, CO		
PTX-1568	2021-01-26 Invitae PCM Intensive Presentation	ARCHER02000286-ARCHER02000316	R, 403, C, H, A, LK, CO		
PTX-1569	2021-03-02 Email from Browning to Stefanelli re Your Approval needed for Merck US PCM pilot pricing	ARCHER02014319	R, 403, C, H, A, LK, CO		
PTX-1570	ArcherDX Stratafide DX Premarket Approval Application (M200016)	ARCHER01994216-ARCHER01994302	R, 403, C, H, A, LK, CO, IO		
PTX-1571	2021-03-24 Invitae BioNTech: TNBC and CRC PCM for Landmark MRD Presentation	ARCHER01988121-ARCHER01988124	R, 403, C, H, A, LK		
PTX-1572	2021-02-25 Email from Shaw to Ebbesen re Project Apollo PFI items	ARCHER02012879-ARCHER02012883	R, 403, C, H, A, LK, CO		
PTX-1573	2021-02-11 Invitae Oncology All Hands Presentation	ARCHER01999884-ARCHER01999949	R, 403, C, H, A, LK, CO		
PTX-1574	2021-02-16 Invitae PCM Competitive Snapshot Presentation	ARCHER02000317-ARCHER02000350	R, 403, C, H, A, LK, CO		
PTX-1575	2021-02-11 Email from Meyer to Stefanelli re Update re: AZ CAPitello-191	ARCHER02008341	R, 403, C, H, A, LK, CO		
PTX-1576	2021-02-25 Invitae Oncology Expansion Planning Presentation	ARCHER01999991-ARCHER02000045	R, 403, C, H, A, LK, CO		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1577	ArcherDX MRD-M002 Assay for ctDNA Verification and Validation Plan	ARCHER02019272-ARCHER02019286	R, 403, C, H, A, LK, CO, BE		
PTX-1578	ArcherDX Stratafide DX Premarket Approval Application (M200016)	ARCHER01994718-ARCHER01994804	R, 403, C, H, A, LK, CO, IO, DU		
PTX-1579	Archer RevealDX METamp ctDNA Test Risk Management Summary RMF12-A-3	ARCHER02050893-ARCHER02050903	R, 403, C, H, A, LK, CO		
PTX-1580	Spreadsheet: IlluminaDx Scheduler	ARCHER02026209	R, 403, C, H, A, LK, CO		
PTX-1581	Identafide Data Development Plan DHF##	ARCHER02020737-ARCHER02020771	R, 403, C, H, A, LK, CO, BE, IO		
PTX-1582	Personalized Cancer Monitoring (PCM) Product Plan	ARCHER02000404-ARCHER02000492	R, 403, C, H, A, LK, CO		
PTX-1583	STRATAFIDE PMA (M200014) Module 4: Clinical Studies, Labeling, Post-Marketing Plan, and Other Info	ARCHER02066596-ARCHER02066649	R, 403, C, H, A, LK, CO		
PTX-1584	Draft Archer VariantPlex Somatic Protocol for Torrent LA566.A	ARCHER01981180-ARCHER01981206	R, 403, C, H, A, LK, CO		
PTX-1585	ArcherDX VariantPlex Presentation	ARCHER01996888-ARCHER01996941	R, 403, C, H, A, LK, CO		
PTX-1586	Final Bioanalytical Study Report (BSR)	ARCHER02017297-ARCHER02017308	R, 403, C, H, A, LK, CO, IO		
PTX-1587	2013-11-25 Distribution of In Vitro Diagnostic Products Labeled for Research Use Only or Investigational Use Only	ARCHER01972363-ARCHER01972374	R, 403, C, H, A, LK		
PTX-1588	Spreadsheet: TCV - KPMG Requested TCV Details	ARCHER02013060	R, 403, C, H, A, LK, CO		
PTX-1589	2021-03-18 Laboratory Services Statement of Work between Genosity and ArcherDx	ARCHER02017485-ARCHER02017488	R, 403, C, H, A, LK, CO, BE		
PTX-1590	ArcherDx -Qiagen Distribution Terms	ARCHER01986161-ARCHER01986167	R, 403, C, H, A, LK, CO		
PTX-1591	2021-03-08 PAC Meeting Presentation	ARCHER02004188-ARCHER02004227	R, 403, C, H, A, LK, CO		
PTX-1592	2019-12-30 ArcherDX invoice #1149	ARCHER01983191	R, 403, C, H, A, LK, CO		
PTX-1593	Enzymatics Archer ALK, RET, ROS1 Fusion Detection v1 Illumina Platform P/N AK0001-8	ARCHER01984780-ARCHER01984795	R, 403, C, H, A, LK		
PTX-1594	October 2019 Archer Overview Presentation	ARCHER01992484-ARCHER01992534	R, 403, C, H, A, LK		
PTX-1595	2020-09-04 ArcherDX Overview Presentation	ARCHER02023854-ARCHER02023909	R, 403, C, H, A, LK, CO		
PTX-1596	2021-02-18 Email from McMahon to Druley re Overview Deck - Partnerships	ARCHER02008519	R, 403, C, H, A, LK, CO		
PTX-1597	1H 2021 ArcherDX Goal Sheet Team CDx Business Overview (Hoenes)	ARCHER02015392-ARCHER02015397	R, 403, C, H, A, LK, CO		
PTX-1598	1H 2021 ArcherDX Goal Sheet Team CDx Business Overview (Montex)	ARCHER02015386-ARCHER02015391	R, 403, C, H, A, LK, CO		
PTX-1599	1H 2021 ArcherDX Goal Sheet Team CDx Business Overview (Adams)	ARCHER02015380-ARCHER02015385	R, 403, C, H, A, LK, CO		
PTX-1600	1H 2021 ArcherDX Goal Sheet Team CDx Business Overview (Kuraishy)	ARCHER02015398-ARCHER02015403	R, 403, C, H, A, LK, CO		
PTX-1601	Spreadsheet: 2021-02-11 January Reporting to NVTA	ARCHER02013973	R, 403, C, H, A, LK, CO		
PTX-1602	LiquidPlex™ Universal Solid Tumor Product Insert	ARCHER02007357-ARCHER02007359	R, 403, C, H, A, LK		
PTX-1603	Spreadsheet: Oncology commercial planning grid	ARCHER02008436	R, 403, C, H, A, LK, CO		
PTX-1604	Archer FusionPlex Protocol for Illumina LA135.1	ARCHER02007774-ARCHER02007799	R, 403, C, H, A, LK, CO		
PTX-1605	Invitae March 2021 PCM Competitive Landscape Analysis Write-Up	ARCHER02008654-ARCHER02008662	R, 403, C, H, A, LK, CO		
PTX-1606	Archer FusionPlex Protocol for Ion Torrent™ LA250.E	ARCHER01984408-ARCHER01984429	R, 403, C, H, A, LK, CO		
PTX-1607	Spreadsheet: 2021-02-15 Invitae - PCM revenue fest for YE2021	ARCHER02014176	R, 403, C, H, A, LK, CO		
PTX-1608	2021-02-10 Invitae Stratafide Ex-US Launch Support Preliminary Summary of Findings	ARCHER02009393-ARCHER02009875	R, 403, C, H, A, LK, CO		
PTX-1609	2021-02-10 Draft Invitae Stratafide Ex-US Launch Support Preliminary Summary of Findings	ARCHER02010417-ARCHER02010896	R, 403, C, H, A, LK, CO		
PTX-1610	Spreadsheet: 2021-03-19 Dashboard Sales Tool with Inventory Cost and Margins	ARCHER02011729	R, 403, C, H, A, LK, CO		
PTX-1611	2020-03-13 Email from Stahl to Russel re BMS Initiation Agreement Update	ARCHER02115575-ARCHER02115576	R, 403, C, H, A, LK, CO		
PTX-1612	2020-05-26 Email from Chapman to Fugere re AZ Collaboration Coverage Update	ARCHER02102654-ARCHER02102656	R, 403, C, H, A, LK, CO		
PTX-1613	2020-05-04 Email from Andrews to Stahl re AX CAPtello-191 bioinformatics ask	ARCHER02133338-ARCHER02133339	R, 403, C, H, A, LK, CO		
PTX-1614	2018-05-10 Email from Stahl to Abbosh re Updated TRACERx-ArcherDX collaboration overview	ARCHER02125291-ARCHER02125293	R, 403, C, H, A, LK, CO		
PTX-1615	2020-05-14 Email from Fugere to Tillson re Interpace VP-CTL Training Summary	ARCHER02103723-ARCHER02103724	R, 403, C, H, A, LK, CO		
PTX-1616	2020-09-14 Email from Swider to Russel re Material Agreements (ArcherDx)	ARCHER02116384	R, 403, C, H, A, LK, CO		
PTX-1617	2020-02-12 Email from Gilbert to Stahl re BMS SOW discussion	ARCHER02135697-ARCHER02135702	R, 403, C, H, A, LK, CO		
PTX-1618	2016-09-26 Email from DuMond to Stefanelli re ArcherDX dives into liquid biopsy research with Reveal ctDNA 28 assay	ARCHER02162034-ARCHER02162035	R, 403, C, H, A, LK, CO		
PTX-1619	2016-08-10 Email from Haimes to Stefanelli re AstraZeneca samples	ARCHER02162013-ARCHER02162019	R, 403, C, H, A, LK, CO		
PTX-1620	2020-05-05 Email from Wallace to Stefanelli re Genentech PCM	ARCHER02183872-ARCHER02183873	R, 403, C, H, A, LK, CO		
PTX-1621	2020-05-22 Email from Ledford to Stefanelli re IVD>Research Product PCM	ARCHER02183081-ARCHER02183082	R, 403, C, H, A, LK, CO		
PTX-1622	ArcherDX Precision Genomics Flyer PN-MKT-0025	ARCHER02235181	R, 403, C, H, A, LK		
PTX-1623	VariantPlex CFTR Product Insert LA573.A	ARCHER02235433-ARCHER02235434	R, 403, C, H, A, LK		
PTX-1624	Invitae Personalized Cancer Monitoring (PCM) Fact Sheet Flyer	ARCHER02298373-ARCHER02298374	R, 403, C, H, A, LK		
PTX-1625	2020-09-18 Email from Adams to stefanelli re TRACERx	ARCHER02189052-ARCHER02189054	R, 403, C, H, A, LK, CO		
PTX-1626	2020-10-13 Email from Meyer to Stahl re ADAURA pilot discussion	ARCHER02208298	R, 403, C, H, A, LK, CO		
PTX-1627	July 2020 Archer Differentiating LiquidPlex and Personalized Cancer Monitoring	ARCHER02299671-ARCHER02299700	R, 403, C, H, A, LK, CO		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1628	IDENTAFIDE Website Updates	ARCHER02298948-ARCHER02298953	R, 403, C, H, A, LK, BE		
PTX-1629	2019-09-27 Email from Schluter to Stefanelli re BMS follow up	ARCHER02190405-ARCHER02190406	R, 403, C, H, A, LK, CO		
PTX-1630	IDENTAFIDE Brand Awareness Launch Presentation	ARCHER02298883-ARCHER02298901	R, 403, C, H, A, LK, CO		
PTX-1631	Spreadsheet: 2021-03-18 Stratafide, Myeloid, PCM forecasting NKP	ARCHER02299727	R, 403, C, H, A, LK, CO		
PTX-1632	ArcherMET Product Overview Presentation	ARCHER02297954-ARCHER02297967	R, 403, C, H, A, LK, CO		
PTX-1633	2021-02-10 Email from Rao to Stahl re Let's get PCM out of CRUSH Natera!	ARCHER02229465	R, 403, C, H, A, LK, CO		
PTX-1634	Archer FusionPlex Solid Tumor Panel AMP027.A Flyer	ARCHER02238201-ARCHER02238202	R, 403, C, H, A, LK		
PTX-1635	Qiagen marketing Presentation	ARCHER02291979-ARCHER02291985	R, 403, C, H, A, LK, CO		
PTX-1636	Molecular Barcodes - FAQ	ARCHER02101755-ARCHER02101761	R, 403, C, H, A, LK		
PTX-1637	2015-04-29 Email from Bon to Training Summary re Medical College of WI Training Summary	ARCHER02097628-ARCHER02097629	R, 403, C, H, A, LK, CO		
PTX-1638	May Monthly Training Quiz Summary	ARCHER02102354-ARCHER02102361	R, 403, C, H, A, LK, CO		
PTX-1639	Spreadsheet: MRD and CTA Forecast 2020 UPDATED INVOICES	ARCHER02113040	R, 403, C, H, A, LK, CO		
PTX-1640	Spreadsheet: Stratafide Clinical Evidence	ARCHER02102711	R, 403, C, H, A, LK, CO		
PTX-1641	2014-11-13 Archer AMP Sales Presentation	ARCHER02092044-ARCHER02092079	R, 403, C, H, A, LK, CO		
PTX-1642	2020-08-26 Email from Latimer to Myers re Archer Revenue and Actuals Forecasting Report	ARCHER02096180	R, 403, C, H, A, LK, CO		
PTX-1643	2017-12-01 The Jackson Laboratory and ArcherDX License Agreement	ARCHER02115670-ARCHER02115680	R, 403, C, H, A, LK, CO		
PTX-1644	Archer Illumina Partnership Governance Commercial Committee & Subteam Contacts	ARCHER02102864	R, 403, C, H, A, LK, CO		
PTX-1645	2020-08-18 Email from Alexander to Rougier-Chapman re Approval Requested: PCM Customer Fact Sheet	ARCHER02110083-ARCHER02110087	R, 403, C, H, A, LK, CO		
PTX-1646	2016-12-13 ArcherDx and Illumina Non-binding terms sheet	ARCHER02096422-ARCHER02096425	R, 403, C, H, A, LK, CO		
PTX-1647	Identafide by Archer Personalized Cancer Monitoring Fact Sheet	ARCHER02110088-ARCHER02110089	R, 403, C, H, A, LK, CO		
PTX-1648	2020-04-30 Archer VariantPlex-CTL (Catalog) FAS Training Summary	ARCHER02102671-ARCHER02102677	R, 403, C, H, A, LK, CO		
PTX-1649	Spreadsheet: 2020-08-31 ArcherMET- Sales Report - Profiling Products and Services	ARCHER02107830	R, 403, C, H, A, LK, CO		
PTX-1650	Spreadsheet: 2020-08-31 APAC - Sales Report - Profiling Products and Services	ARCHER02107831	R, 403, C, H, A, LK, CO		
PTX-1651	FY' 2020 ArcherDX Goal Sheet (Wallace)	ARCHER02115775-ARCHER02115779	R, 403, C, H, A, LK, CO		
PTX-1652	FY' 2020 ArcherDX Goal Sheet (Schluter)	ARCHER02115790-ARCHER02115794	R, 403, C, H, A, LK, CO		
PTX-1653	FY' 2020 ArcherDX Goal Sheet (Siferd)	ARCHER02115780-ARCHER02115784	R, 403, C, H, A, LK, CO		
PTX-1654	FY' 2020 ArcherDX Goal Sheet (Bernice)	ARCHER02115785-ARCHER02115789	R, 403, C, H, A, LK, CO		
PTX-1655	June 2020 Archer PCM Graphic Design Schematics Presentation	ARCHER02109857-ARCHER02109860	R, 403, C, H, A, LK, CO		
PTX-1656	Spreadsheet: KPMG Support Apollo Standalone	ARCHER02118281	R, 403, C, H, A, LK, CO		
PTX-1657	2018-10-02 Email from Stahl to Casey re Invoice for WP1 and WP2	ARCHER02124615-ARCHER02124616	R, 403, C, H, A, LK, CO		
PTX-1658	Spreadsheet: 2020-09-08 APAC - Sales Report - Profiling Products and Services	ARCHER02107765	R, 403, C, H, A, LK, CO		
PTX-1659	ArcherDX Global Sales & Support Meeting 2020 Presentation	ARCHER02104166-ARCHER02104207	R, 403, C, H, A, LK, CO		
PTX-1660	2020-06-18 PCM Non-registrational Retrospective Testing Qualification Form - Gritstone Oncology	ARCHER02177435	R, 403, C, H, A, LK, CO		
PTX-1661	Archer Technical Note: 95 MDAF: Modeling Noise in Archer NGS Data with Per-Case Resolution for Statistically Informed, Position-Dependent Variant Calling	ARCHER02168007-ARCHER02168013	R, 403, C, H, A, LK		
PTX-1662	2018-06-29 Work Order No. A-2 Feasibility: Limit of Detection (LOD) and CLIA/CAP Validation between H3 Biomedicine and ArcherDx	ARCHER02168971-ARCHER02168976	R, 403, C, H, A, LK, CO		
PTX-1663	Archer FusionPlex FGFR Kit for Illumina Protocol PR-SK0030-ILMN	ARCHER02165754-ARCHER02165772	R, 403, C, H, A, LK		
PTX-1664	ArcherDX Technology Overview Clinical Trial Network Discussion Presentation	ARCHER02171176-ARCHER02171192	R, 403, C, H, A, LK		
PTX-1665	FY' 2020 ArcherDX Goal Sheet (Siferd)	ARCHER02180509-ARCHER02180513	R, 403, C, H, A, LK, CO		
PTX-1666	FusionPlex Solid Tumor Product Insert LA179.A	ARCHER02157380-ARCHER02157383	R, 403, C, H, A, LK		
PTX-1667	Archer FusionPlex Protocol for Illumina LA135.F	ARCHER02157384-ARCHER02157407	R, 403, C, H, A, LK		
PTX-1668	2017-10-16 Amendment No. 3 to Companion Diagnostic Initiation Agreement between ArcherDx and Celgene	ARCHER02191604-ARCHER02191620	R, 403, C, H, A, LK, CO		
PTX-1669	Spreadsheet: Def Rev FV Follow-up	ARCHER02231356	R, 403, C, H, A, LK, CO		
PTX-1670	GMSA0028 Universal ctDNA Assay, GSP1 S19-W32-F19	ARCHER02216147-ARCHER02216154	R, 403, C, H, A, LK, CO		
PTX-1671	2019-05-12 Laboratory Service Provider Agreement between Celgene and ArcherDX	ARCHER02191950-ARCHER02191982	R, 403, C, H, A, LK, CO		
PTX-1672	LiquidPlex™ ctDNA 28 LA173.0	ARCHER02231124-ARCHER02231126	R, 403, C, H, A, LK		
PTX-1673	2019-03-XX Deed of Amendment between University College London, UCL Business PLC, ArcherDX, The Francis Crick Institute Ltd.	ARCHER02219099-ARCHER02219104	R, 403, C, H, A, LK, CO, BE		
PTX-1674	2015-05-27 ArcherDX Sales Training Presentation	ARCHER02285751-ARCHER02285970	R, 403, C, H, A, LK,		
PTX-1675	2021-03-01 Email from Simons to McKeough re Monday's Invitae & Relevants Industry News	ARCHER02229515-ARCHER02229517	R, 403, C, H, A, LK		
PTX-1676	Karow, Julia (2021) Natera Launches Tumor Genomic Profiling Assay, Expexts Reproductive health to Break Even this Year, GenomeWeb Premium	ARCHER02229530-ARCHER02229532	R, 403, C, H, A, LK, CO		
PTX-1677	2020-09-30 Schedule 1 - Statement of Work 1 - Amendment 1, Project: IDE CNB Feasibility between AstraZeneca and ArcherDX	ARCHER00092494-ARCHER00092497	R, 403, C, H, A, LK, CO		
PTX-1678	2019-07-24 Schedule 1 - Statement of Work 2c - CTA Planning and China HGR Support between AstraZeneca and ArcherDx	ARCHER00092468-ARCHER00092473	R, 403, C, H, A, LK, CO		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1679	2020-11-20 Laboratory Services Statement of Work between Genosity and ArcherDX	ARCHER00092478-ARCHER00092483	R, 403, C, H, A, LK, CO, DE		
PTX-1680	2020-11-20 Laboratory Services Statement of Work between Genosity and ArcherDX	ARCHER00092498-ARCHER00092501	R, 403, C, CO		
PTX-1681	2020-08-25 Laboratory Services Statement of Work between Genosity and ArcherDX	ARCHER00093145-ARCHER00093147	R, 403, C, CO		
PTX-1682	2020-06-15 Laboratory Services Statement of Work between Genosity and ArcherDX	ARCHER00093151-ARCHER00093154	R, 403, C, CO		
PTX-1683	2019-08-13 Laboratory Services Statement of Work between Genosity and ArcherDX	ARCHER00093212-ARCHER00093214	R, 403, C, CO		
PTX-1684	2019-07-24 Schedule 1 - Statement of Work 4, Matrix Study, Plasma Based MRD between AstraZeneca and ArcherDx	ARCHER00092431-ARCHER00092436	R, 403, C, H, A, LK, CO		
PTX-1685	2020-04-03 Laboratory Services Statement of Work Amendment #2 between Genosity and ArcherDx	ARCHER00093163-ARCHER00093166	R, 403, C, CO		
PTX-1686	2019-07-24 Schedule 1 - Statement of Work 7 - SAXON Feasibility between AstraZeneca and ArcherDx	ARCHER00092489-ARCHER00092493	R, 403, C, H, A, LK, CO		
PTX-1687	2019-08-12 Laboratory Services Statement of Work between Genosity and ArcherDX	ARCHER00093194-ARCHER00093196	R, 403, C, CO		
PTX-1688	2020-06-03 Laboratory Services Statement of Work #2 between Genosity and ArcherDX	ARCHER00093207-ARCHER00093211	R, 403, C, CO		
PTX-1689	2020-11-20 Laboratory Services Statement of Work between Genosity and ArcherDX	ARCHER00093100-ARCHER00093103	R, 403, C, CO		
PTX-1690	2020-03-20 Laboratory Services Statement of Work between Genosity and ArcherDX	ARCHER00093093-ARCHER00093095	R, 403, C, CO		
PTX-1691	2020-09-10 Laboratory Services Statement of Work between Genosity and ArcherDX	ARCHER00092524-ARCHER00092526	R, 403, C, CO		
PTX-1692	2020-07-15 Laboratory Services Statement of Work between Genosity and ArcherDX	ARCHER00093112-ARCHER00093127	R, 403, C, CO		
PTX-1693	2019-10-25 Amendment #1 to Laboratory Services Statement of Work for Protocol P2809181 between Genosity and ArcherDX	ARCHER00093192-ARCHER00093193	R, 403, C, CO		
PTX-1694	2019-07-24 Schedule 1 - Statement of Work 7 - SAXON Feasibility between AstraZeneca and ArcherDx	ARCHER00092745-ARCHER00092752	R, 403, C, H, A, LK, CO, DU, CU		
PTX-1695	2019-07-24 Schedule 1 - Statement of Work 4 - Matrix Study, Plasm Based MRD between AstraZeneca and ArcherDx	ARCHER00092533-ARCHER00092538	R, 403, C, H, A, LK, CO, DU, CU		
PTX-1696	2019-07-24 Schedule 1 - Statement of Work 6 - Breast Feasibility between AstraZeneca and ArcherDx	ARCHER00092474-ARCHER00092477	R, 403, C, H, A, LK, CO		
PTX-1697	2019-07-24 Schedule 1 - Statement of Work 2c - CTA Planning and China HGR Support between AstraZeneca and ArcherDx	ARCHER00092709-ARCHER00092717	R, 403, C, H, A, LK, CO, DU, CU		
PTX-1698	Lab Services Agreement between Genosity and ArcherDx	ARCHER00093096-ARCHER00093099	R, 403, C, H, A, LK, CO		
PTX-1699	2020-11-13 Laboratory Services Statement of Work #3 between Genosity and ArcherDX	ARCHER00093200-ARCHER00093206	R, 403, C, H, A, LK, CO		
PTX-1700	2019-12-11 Laboratory Services Statement of Work between Genosity and ArcherDX	ARCHER00093174-ARCHER00093184	R, 403, C, CO		
PTX-1701	2019-12-11 Statement of Work 2a between AstraZeneca and ArcherDX	ARCHER00092766-ARCHER00092777	R, 403, C, CO		
PTX-1702	2019-07-24 Schedule 1 - Statement of Work 6 - Breast Feasibility between AstraZeneca and ArcherDx	ARCHER00092724-ARCHER00092727	R, 403, C, H, A, LK, CO, DU, CU		
PTX-1703	2019-07-24 Schedule 1 - Statement of Work 5 - Panel Output File (cariant_list.txt) between AstraZeneca and ArcherDx	ARCHER00092718-ARCHER00092723	R, 403, C, H, A, LK, CO, DU, CU		
PTX-1704	2019-07-24 Schedule 1 - Statement of Work 1 Project: IDE CNB Feasibility between AstraZeneca and ArcherDX	ARCHER00092778-ARCHER00092781	R, 403, C, H, A, LK, CO		
PTX-1705	2020-05-10 Laboratory Services Statement of Work #3 between Genosity and ArcherDX	ARCHER00093167-ARCHER00093173	R, 403, C, CO		
PTX-1706	2019-07-24 Schedule 1 - Statement of Work 3, Plasma Based MRD Testing in Support of AZ Br.31 Lung Study between AstraZeneca and ArcherDx	ARCHER00092735-ARCHER00092744	R, 403, C, H, A, LK, CO, BE		
PTX-1707	2020-06-09 Laboratory Services Statement of Work between Genosity and ArcherDX	ARCHER00093188-ARCHER00093191	R, 403, C, CO		
PTX-1708	2020-04-22 In Vitro Diagnostics Master Collaboration Agreement between AstraZeneca and ArcherDX	ARCHER00092347-ARCHER00092430	R, 403, C, H, A, LK, CO		
PTX-1709	2020-11-05 Laboratory Services Statement of Work between Genosity and ArcherDX	ARCHER00093128-ARCHER00093144	R, 403, C, CO		
PTX-1710	2020-06-21 Project Apollo BOD Update Presentation	ARCHER00093315-ARCHER00093325	R, 403, C, H, A, LK, CO		
PTX-1711	2020-05-22 Project Apollo Discussion Materials Presentation	ARCHER00093635-ARCHER00093655	R, 403, C, H, A, LK, CO		
PTX-1712	2020-06-19 Project Apollo: Board Discussion Materials Presentation	ARCHER00093401-ARCHER00093419	R, 403, C, H, A, LK, CO		
PTX-1713	2020-10-02 KPMG Invitae Corporation Presentation	ARCHER00093219-ARCHER00093305	R, 403, C, H, A, LK, CO		
PTX-1714	Spreadsheet: 2021-06-04 MetroPark Orders AMP	ARCHER00093656	R, 403, C, H, A, LK, CO		
PTX-1715	2019-01-06 First Amendment to Asset Purchase Agreement between Invitae, Good Start Genetics, Molecular Loop Biosolutions, and OrbiMed	ARCHER00093681-ARCHER00093682	R, 403, C, H, A, LK, CO		
PTX-1716	2021-03-30 Filed DE SOS UCC-3 Termination Statement - Molecular Loop Biosolutions, LLC, Debtor	ARCHER00093700	R, 403, C, H, A, LK, CO		
PTX-1717	2019-11-05 Third Amendment to Asset Purchase Agreement between Invitae, Good Start Genetics, Molecular Loop Biosolutions, and OrbiMed	ARCHER00093685-ARCHER00093686	R, 403, C, H, A, LK, CO		
PTX-1718	2019-11-05 Third Amendment to Secured Promissory Note between Invitae, and Molecular Loop Biosolutions	ARCHER00093752	R, 403, C, H, A, LK, CO		
PTX-1719	2021-04-05 Affidavit of Lost Note between Invitae and Molecular Loop Biosolutions	ARCHER00093679-ARCHER00093680	R, 403, C, H, A, LK, CO		
PTX-1720	2021-03-12 Patent Acknowledgement between Invitae, Molecular Loop Biosolutions, Good Start Genetics, and OrbiMed	ARCHER00093693-ARCHER00093698	R, 403, C, H, A, LK, CO		
PTX-1721	2021-03-13 Fifth Amendment Asset Purchase Agreement between Invitae, Molecular Loop Biosolutions, Good Start Genetics, and OrbiMed	ARCHER00093687-ARCHER00093690	R, 403, C, H, A, LK, CO		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1722	2018-10-16 Filed DE SOS UCC-1 Financing Statement - Molecular Loop Biosolutions, LLC (Debtor) and Invitae Corporation (Secured Party)	ARCHER00093699	R, 403, C, H, A, LK, CO		
PTX-1723	2019-03-04 Omnibus Amendment to Asset Purchase Agreement and Patent Assignment Agreement between Invitae, Good Start Genetics, Molecular Loop Biosolutions, and OrbiMed	ARCHER00093691-ARCHER00093692	R, 403, C, H, A, LK, CO		
PTX-1724	2019-01-06 First Amendment to Secured Promissory note between Invitae and Molecular Loop Biosolutions	ARCHER00093750	R, 403, C, H, A, LK, CO		
PTX-1725	2021-03-13 Patent Assignment Agreement between Invitae and Molecular Loop Biosciences	ARCHER00093777-ARCHER00093780	R, 403, C, H, A, LK, CO		
PTX-1726	2019-05-16 Second Amendment to Asset Purchase Agreement between Invitae, Good Start Genetics, Molecular Loop Biosolutions, and OrbiMed	ARCHER00093683-ARCHER00093684	R, 403, C, H, A, LK, CO		
PTX-1727	2019-05-16 Second Amendment to secured Promissory note between Invitae and Molecular Loop Biosolutions	ARCHER00093751	R, 403, C, H, A, LK, CO		
PTX-1728	2021-03-13 Cross License Agreement between Molecular Loop and Invitae	ARCHER00093769-ARCHER00093776	R, 403, C, H, A, LK, CO		
PTX-1729	2018-10-12 Invitae Sale of MIP Assets to Molecular Loop Biosolutions, LLC Closing	ARCHER00093701-ARCHER00093749	R, 403, C, H, A, LK, CO		
PTX-1730	2021-03-13 Asset Purchase Agreement between Invitae and Molecular Loop Biosciences	ARCHER00093753-ARCHER00093768	R, 403, C, H, A, LK, CO		
PTX-1731	2013-03-04 Confidentiality Agreement between ArcherDx and Laboratory Corporation of America Holdings	ARCHER00093865-ARCHER00093867	R, 403, C, H, A, LK, CO		
PTX-1732	2015-10-13 Confidentiality Agreement between ArcherDx and Laboratory Corporation of America Holdings	ARCHER00093868-ARCHER00093871	R, 403, C, H, A, LK, CO		
PTX-1733	Spreadsheet: 2020-07-15 Labcorp Pricing Addendum	ARCHER00093917	E		
PTX-1734	2017-09-26 Archer Analysis Statement of Work between ArcherDX and Laboratory Corporation of America Holdings	ARCHER00093854-ARCHER00093857	R, 403, C, H, A, LK, CO		
PTX-1735	2018-03-12 Archer Work Order between ArcherDX and Laboratory Corporation of America Holdings	ARCHER00093889-ARCHER00093900	R, 403, C, H, A, LK, CO		
PTX-1736	2016-04-07 Master Agreement between ArcherDX and Laboratory Corporation of America Holdings	ARCHER00093933-ARCHER00093942	R, 403, C, H, A, LK, CO		
PTX-1737	2017-09-26 Computer Consulting and Programming Service Agreement between ArcherDX and Laboratory Corporation of America Holdings	ARCHER00093858-ARCHER00093864	R, 403, C, H, A, LK, CO		
PTX-1738	2020-06-06 Master Companion Diagnostics Collaboration Agreement between LabCorp and ArcherDX	ARCHER00093901-ARCHER00093916	R, 403, C, H, A, LK, CO		
PTX-1739	2019 Master Services Agreement between AstraZeneca and ArcherDX	ARCHER00093781-ARCHER00093853	R, 403, C, H, A, LK, CO		
PTX-1740	PDF of GTF file for PSPs used in MRD Assay	ARCHER00095811	R, 403, C, H, A, LK, CO		
PTX-1741	Spreadsheet: 2020-08-31 ArcherMET- Sales Report - Profiling Products and Services	ARCHER02306456	R, 403, C, H, A, LK, CO		
PTX-1742	Spreadsheet: 2020-08-31 Sales Report - Profiling Products and Services	ARCHER02306455	E		
PTX-1743	2021-02-04 Email from Berlin to Kuraishy re Merck US PCM Trial	ARCHER02448863-ARCHER02448867	R, 403, C, H, A, LK, CO		
PTX-1744	2020-03-25 Email from Chapman to Soufan re Japan ArcherMET Approval Coverage Update	ARCHER02385581-ARCHER02385583	R, 403, C, H, A, LK, CO		
PTX-1745	2020-07-14 Email from Israyelyan to Druley re Collaboration	ARCHER02360214-ARCHER02360221	R, 403, C, H, A, LK, CO		
PTX-1746	2016-04-21 IVD Collaboration Agreement between Illumina and ArcherDx	ARCHER02471502-ARCHER02471516	R, 403, C, H, A, LK, CO, BE		
PTX-1747	Spreadsheet: Apollo Final Purchase Price Reconcilia	ARCHER02468875	E		
PTX-1748	2020-08-14 ArcherDx SEC 10-Q	ARCHER02450297-ARCHER02450350	R, 403, C, H, A, LK, CO, BE		
PTX-1749	2020-06-05 ArcherDX SEC S-1	ARCHER02467220-ARCHER02467496	R, 403, C, H, A, LK		
PTX-1750	Spreadsheet: 2021-02-22 CDx Milestone Weekly Variance File	ARCHER02476306	R, 403, C, H, A, LK, CO		
PTX-1751	Spreadsheet: 2020-04-17 CDx Revenue and Forecasting Report	ARCHER02476232	R, 403, C, H, A, LK, CO		
PTX-1752	2020-12-02 Archer Pricing Update: PCM Presentation	ARCHER02521240-ARCHER02521262	R, 403, C, H, A, LK, CO		
PTX-1753	Spreadsheet: Board Mtg Q1 2020 CDx Revenue and Forecasting Report	ARCHER02476297	R, 403, C, H, A, LK, CO		
PTX-1754	2020-08-14 ArcherDx SEC 10-Q	ARCHER02450569-ARCHER02450621	R, 403, C, H, A, LK		
PTX-1755	2020-12-08 Archer Pricing Update: PCM Presentation	ARCHER02521263-ARCHER02521285	R, 403, C, H, A, LK, CO		
PTX-1756	2017-01-10 Overview of Qiagen Issues Presentation	ARCHER02360542-ARCHER02360548	R, 403, C, H, A, LK, CO		
PTX-1757	ArcherDX ASC 606 Analysis - Companion Diagnostics Contract with Merck KGaA	ARCHER02474700-ARCHER02474711	R, 403, C, H, A, LK, CO		
PTX-1758	ArcherDX MRD Presentation	ARCHER02359254-ARCHER02359335	R, 403, C, H, A, LK, CO		
PTX-1759	Personalized Cancer Monitoring (PCM) Product Plan	ARCHER02519495-ARCHER02519593	R, 403, C, H, A, LK, CO		
PTX-1760	Spreadsheet: PCM slide deck charts	ARCHER02386340	R, 403, C, H, A, LK, CO		
PTX-1761	FY' 2020 ArcherDX Goal Sheet (Stefanelli)	ARCHER02397515-ARCHER02397520	R, 403, C, H, A, LK, CO		
PTX-1762	2019-07-16 Draft Term Sheet for Proposed License between UCL Business PLC and ArcherDx	ARCHER02402250-ARCHER02402256	R, 403, C, H, A, LK, CO, BE		
PTX-1763	2020-08-08 Archer Updated S-4	ARCHER02467497-ARCHER02468039	R, 403, C, H, A, LK		
PTX-1764	Warrant Certificate WB-01 between ArcherDX and Perceptive Credit Holdings II	ARCHER02397795-ARCHER02398249	R, 403, C, H, A, LK, CO		
PTX-1765	2019-03-22 License Agreement between Becton, Dickinson and Company and ArcherDx	ARCHER02446679-ARCHER02446700	R, 403, C, H, A, LK, CO		
PTX-1766	STRATAFIDE NTRK Design & Development Plan Design History Document DHF17-A-1-25	ARCHER00116114-ARCHER00116117	R, 403, C, H, A, LK, CO		
PTX-1767	Intentionally Left Blank				
PTX-1768	Abd-El salam, Kamel A. (2003) Bioinformatics tools and guidelines for PCR primer design, African Journal of Biotechnology Vol. 2	ARCHER00123062-ARCHER00123066	R, 403, C, H, A, LK		
PTX-1769	Dieffenbach, CW (1993) General concepts for PCR primer design, Genome Research	ARCHER00122865-ARCHER00122873	R, 403, C, H, A, LK		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1770	Elnifro, Elfath M. (2000) Multiplex PCR: Optimization and Application in Diagnostic Virology, Clinical Microbiology Reviews Vol.13	ARCHER00122981-ARCHER00122992	R, 403, C, H, A, LK		
PTX-1771	Von Ahsen, Nicolas (2001) Oligonucleotide Melting Temperatures under PCR Conditions: Nearest-Neighbor Corrections for Mg2+, Deoxynucleotide Triphosphate, and Dimethyl Sulfoxide Concentrations with Comparison to Alternative Empirical Formulas, Clinical Chemistry 47	ARCHER00124740-ARCHER00124745	R, 403, C, H, A, LK		
PTX-1772	Chavali, Sreenivas (2005) Oligonucleotide properties determination and primer designing: a critical examination of predictions, Bioinformatics Vol. 21	ARCHER00124668-ARCHER00124675	R, 403, C, H, A, LK		
PTX-1773	Panjikovich, Alejandro (2005) Comparison of different melting temperature calculation methods for short DNA sequences, Bioinformatics Vol. 21	ARCHER00124656-ARCHER00124667	R, 403, C, H, A, LK		
PTX-1774	Wartell, Roger M. (1985) Thermal Denaturation of DNA Molecules: A Comparison of Theory with Experiment, Physics Reports 126	ARCHER00124686-ARCHER00124726	R, 403, C, H, A, LK		
PTX-1775	Spreadsheet: 2021-08-15 2015-2021 YTD (June)	ARCHER00128027	R, 403, C, H, A, LK, CO		
PTX-1776	Spreadsheet: 2021-09-01 Revenue by Pharma Partner for FDA development	ARCHER00128790	R, 403, C, H, A, LK, CO		
PTX-1777	Spreadsheet: 2021-09-03 StL samples	ARCHER00128885	R, 403, C, H, A, LK, CO		
PTX-1778	2020-03-27 Initiation Agreement between Bristol Myers Squibb Company and ArcherDX	ARCHER00130147-ARCHER00130168	R, 403, C, H, A, LK, CO		
PTX-1779	2021-09-27 Invitae PCM MRD Present Monitoring Report GEC2108761 Test Results AA103a v5 ID 100843	ARCHER00130027-ARCHER00130028	R, 403, C, H, A, LK, CO		
PTX-1780	2021-09-27 Invitae PCM MRD Absent Monitoring Report GEC2108761 Test Results AA102a v3 ID 100841	ARCHER00129947-ARCHER00129948	R, 403, C, H, A, LK, CO		
PTX-1781	2021-10-01 Invitae PCM MRD Present Monitoring Report GEC210876 Test Results AA103a v5 ID 100843	ARCHER00130070-ARCHER00130071	R, 403, C, H, A, LK, CO		
PTX-1782	2021-09-27 Invitae PCM MRD Absent Monitoring Report Test Results AA103a v6 ID 100843	ARCHER00130068-ARCHER00130069	R, 403, C, H, A, LK, CO		
PTX-1783	2021-09-27 Invitae PCM MRD Present Monitoring Report Test Results AA102a v4 ID 100841	ARCHER00130072-ARCHER00130073	R, 403, C, H, A, LK, CO		
PTX-1784	2021-09-27 Invitae PCM MRD Absent Baseline Report Test Results	ARCHER00130074-ARCHER00130075	R, 403, C, H, A, LK, CO		
PTX-1785	2021-04-05 AbbVie Inc. and ArcherDX, LLC Non Clinical Laboratory Agreement 00147160.0M14-239	ARCHER00131664-ARCHER00131693	R, 403, C, H, A, LK, CO		
PTX-1786	Archer FusionPlex Lung, SK0133 LA671.B Product Insert	ARCHER00133303-ARCHER00133305	R, 403, C, H, A, LK		
PTX-1787	2021-07-13 Bristol Myers Squibb Company Statement of Work Commercial Pilot Project	ARCHER00132828-ARCHER00132836	R, 403, C, H, A, LK, CO		
PTX-1788	FusionPlex MGH FusionPlex Solid Tumor Corr CSK007936-v1.0	ARCHER00133219	R, 403, C, H, A, LK, CO		
PTX-1789	Custom FusionPlex Lymphoma AK0065 v1.0	ARCHER00133192	R, 403, C, H, A, LK, CO		
PTX-1790	VariantPlex Myeloid LA011.A Product Insert	ARCHER00133289-ARCHER00133294	R, 403, C, H, A, LK		
PTX-1791	2020-04-10 Memorial Sloan Kettering Cancer Center ArcherDX Custom Panel Agreement	ARCHER00132855-ARCHER00132864	R, 403, C, H, A, LK		
PTX-1792	2020-01-21 First Amendment to the SOW FE-00121435.1 Services Agreement between Archer DX Clinical Services and AbbVie Inc.	ARCHER00132839-ARCHER00132841	R, 403, C, H, A, LK, CO		
PTX-1793	FusionPlex CCF Sarcoma SM 15124-v1.0	ARCHER00133195	R, 403, C, H, A, LK, CO		
PTX-1794	FusionPlex FP MGH EWSR1 e3 SM CSK0011137-v1.0	ARCHER00133212	R, 403, C, H, A, LK, CO		
PTX-1795	VariantPlex VariantPlex MGH Myeloid v20 CSK0010019-v1.0	ARCHER00133288	R, 403, C, H, A, LK, CO		
PTX-1796	Archer VariantPlex MSKCC CHIP v2 GSP1 and GSP2 Product Insert	ARCHER00133306-ARCHER00133307	R, 403, C, H, A, LK		
PTX-1797	Archer VariantPlex LA770.0 BMS Core Myeloid 15550 Product Insert	ARCHER00133308-ARCHER00133310	R, 403, C, H, A, LK		
PTX-1798	2021-07-13 Statement of Work Summary Certificate of Completion	ARCHER00133137	R, 403, C, H, A, LK, CO, BE		
PTX-1799	2020-12-11 Bristol-Myers Squibb Company's First Amendment to Statement of Work CA209-915	ARCHER00132178-ARCHER00132180	R, 403, C, H, A, LK, CO		
PTX-1800	2021-04-14 Non-Clinical Laboratory Services Agreement between AbbVie Inc. and ArcherDX LLC	ARCHER00131631-ARCHER00131658	R, 403, C, H, A, LK, CO		
PTX-1801	PDF of 16093 FusionPlex CCF Sarcoma v2-v1.0.gtf	ARCHER00133168	R, 403, C, H, A, LK, CO		
PTX-1802	PDF of Reveal ctDNA MGH GI High MSI CSK0010475-v1.0.gtf	ARCHER00133257	R, 403, C, H, A, LK, CO		
PTX-1803	PDF of CKP0107-v1.0-MGH STVP_with MSI.gtf	ARCHER00133190	R, 403, C, H, A, LK, CO		
PTX-1804	Archer LiquidPlex Celgene AML LA771.1 Product Insert	ARCHER00133313-ARCHER00133315	R, 403, C, H, A, LK		
PTX-1805	Archer FusionPlex MSKCC Solid Tumor v5 Product Insert	ARCHER00133316-ARCHER00133317	R, 403, C, H, A, LK		
PTX-1806	Archer DX LA771.1 LiquidPlex™ TP53 Product Insert	ARCHER00133311-ARCHER00133312	R, 403, C, H, A, LK		
PTX-1807	2017-08-16 ArcherDx CC-90009 Initiation Agreement FE - Signature Page	ARCHER00131862	R, 403, C, H, A, LK, I		
PTX-1808	LiquidPlex 28+BRCA1 2 11555-v1.0	ARCHER00133244	R, 403, C, H, A, LK, CO		
PTX-1809	Reveal BRCA Pool for MGH Breast CSK0014010-v1.0	ARCHER00133254	R, 403, C, H, A, LK, CO		
PTX-1810	VariantPlex BMS Core Myeloid 15550-v1.1.	ARCHER00133264	R, 403, C, H, A, LK, CO		
PTX-1811	2020-09-14 Distributor Agreement between PentaGen s.r.o. and ArcherDX	ARCHER00133054-ARCHER00133085	R, 403, C, H, A, LK, CO		
PTX-1812	VariantPlex MGH Myeloid Final Bulk 16 CSK0012559-v1.0	ARCHER00133273	R, 403, C, H, A, LK, CO		
PTX-1813	2019-12-13 Plaintiff's Responses to 5th set of Interrogatories (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110692-ARCHER00110705	R, 403, C, H, A, LK, CO, NP		
PTX-1814	2020-02-20 Plaintiff's 4th Supp. Responses to 5th set of Interrogatories (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110896-ARCHER00110945	R, 403, C, H, A, LK, CO, NP		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1815	2019-12-13 Plaintiff's 1st Supp. Responses to Def.'s 2nd Set of Interrogatories (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110647-ARCHER00110675	R, 403, C, H, A, LK, CO, NP		
PTX-1816	2020-01-09 Plaintiff's 3rd Supp. Responses 3rd set of Interrogatories (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110740-ARCHER00110768	R, 403, C, H, A, LK, CO, NP		
PTX-1817	2019-12-13 Plaintiff's 2nd Supp. Responses. to Def.'s 1st Set of Interrogatories (No. 2) (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110676-ARCHER00110691	R, 403, C, H, A, LK, CO, NP		
PTX-1818	2019-12-20 Plaintiff's 2nd Supp. Responses to 3rd set of Interrogatories (Nos. 7-11) (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110706-ARCHER00110726	R, 403, C, H, A, LK, CO, NP		
PTX-1819	2020-05-11 Plaintiff's Responses to Defendant's Interrogatory (25) (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00111054-ARCHER00111063	R, 403, C, H, A, LK, CO, NP		
PTX-1820	2020-01-16 Plaintiff's Supp. Responses. to 5th set of Interrogatories (Nos. 22-23) (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110817-ARCHER00110831	R, 403, C, H, A, LK, CO, NP		
PTX-1821	2020-01-16 Plaintiff's Responses to 6th set of Interrogatories (No. 24) (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110808-ARCHER00110816	R, 403, C, H, A, LK, CO, NP		
PTX-1822	2019-12-20 Plaintiff's Supp. Responses to 5th set of Interrogatories (No. 20) (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110727-ARCHER00110739	R, 403, C, H, A, LK, CO, NP		
PTX-1823	2019-06-17 Plaintiff's Responses to 3rd Set of Interrogatories (7-14) (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110586-ARCHER00110603	R, 403, C, H, A, LK, CO, NP		
PTX-1824	2020-07-30 Plaintiff's 2nd Supp. Responses to Interrogatories 16-19 (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00111088-ARCHER00111203	R, 403, C, H, A, LK, CO, NP		
PTX-1825	2019-07-26 Plaintiff's 1st Supp. Responses to 3rd set of Interrogatories (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110613-ARCHER00110631	R, 403, C, H, A, LK, CO, NP		
PTX-1826	2020-08-24 Plaintiff's Suppl. Responses to Third Interrogatories (7&9) (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00111204-ARCHER00111219	R, 403, C, H, A, LK, CO, NP		
PTX-1827	2020-05-11 Plaintiff's 5th Supp. Responses to Def. 3rd Set of Interrogatories (7-14) (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110957-ARCHER00111001	R, 403, C, H, A, LK, CO, NP		
PTX-1828	2019-07-26 Plaintiff's Supp. Responses to Defendant's 1st Set of Interrogatories (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110632-ARCHER00110646	R, 403, C, H, A, LK, CO, NP		
PTX-1829	2019-02-25 Plaintiff's Responses to Defendant's 1st Interrogatories (Nos. 1-4) (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110558-ARCHER00110572	R, 403, C, H, A, LK, CO, NP		
PTX-1830	2020-02-07 Plaintiff's 3rd Supp. Responses to 1st set of Interrogatories (Nos. 1, 3, 4) (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110878-ARCHER00110895	R, 403, C, H, A, LK, CO, NP		
PTX-1831	2020-05-11 Plaintiff's 5th Supp. Responses to Defendants' 5th Set of Interrogatories (22-23) (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00111002-ARCHER00111053	R, 403, C, H, A, LK, CO, NP		
PTX-1832	2020-05-11 Plaintiff's Supp. Responses to Def. 2nd Set of Interrogatories (Nos. 5-6) (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00111064-ARCHER00111087	R, 403, C, H, A, LK, CO, NP		
PTX-1833	2019-07-25 Plaintiff's Responses to 4th set of Interrogatories (No. 15) (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110604-ARCHER00110612	R, 403, C, H, A, LK, CO, NP		
PTX-1834	2019-05-06 Plaintiff's Responses to 2nd Set of Interrogatories (Nos. 5-6) (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110573-ARCHER00110585	R, 403, C, H, A, LK, CO, NP		
PTX-1835	2020-05-11 Plaintiff's 1st Supp. Responses to Defendants' 4th Set of Interrogatories (No. 15) (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110946-ARCHER00110956	R, 403, C, H, A, LK, CO, NP		
PTX-1836	2020-01-24 Plaintiff's Supp. Responses to 5th set of Interrogatories (Nos. 16-19) (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110832-ARCHER00110877	R, 403, C, H, A, LK, CO, NP		
PTX-1837	2021-06-30 Defendants' Sixth Supp. Responses to Interrogatory No. 2 and Fourth Supp. Responses to Interrogatory No. 4 (Ex.8)		R, 403, C, H, A, LK, CO, NP		
PTX-1838	2021-03-01 Plaintiff's Opening Brief in support of MPSJ (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00111481-ARCHER00111520	R, 403, C, H, A, LK, CO, NP		
PTX-1839	2021-04-19 Plaintiff's Response to Defendant's Concise Statement of Facts in support of Opp. To MPSJ (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00112687-ARCHER00112691	R, 403, C, H, A, LK, CO, NP		
PTX-1840	2021-04-19 Plaintiff's Reply in support of MPSJ (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00112662-ARCHER00112686	R, 403, C, H, A, LK, CO, NP		
PTX-1841	2021-03-01 Plaintiff's Concise Statement of Undisputed Facts in support of MPSJ (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00111521-ARCHER00111529	R, 403, C, H, A, LK, CO, NP		
PTX-1842	2021-04-19 Plaintiff's Declaration of Eric J. Rutt in support of MPSJ (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00112692-ARCHER00112855	R, 403, C, H, A, LK, CO, NP		
PTX-1843	2020-11-20 Expert Report of Raymond S. Sims re Commercial Success (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110375-ARCHER00110419	R, 403, C, H, A, LK, CO, NP		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1844	2020-10-07 Expert Report of Maria Fe Paz, M.D., Ph.D., M.B.A. (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00109149-ARCHER00109177	R, 403, C, H, A, LK, CO, NP		
PTX-1845	2020-12-23 Reply Expert Report of Raymond S. Sims (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00110524-ARCHER00110557	R, 403, C, H, A, LK, CO, NP		
PTX-1846	2020-10-07 Expert Report of Raymond S. Sims (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00109517-ARCHER00110055	R, 403, C, H, A, LK, CO, NP		
PTX-1847	2020-12-23 Rebuttal Expert Report of Christopher A. Martinez re Commercial Success (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00128231-ARCHER00128243	R, 403, C, H, A, LK, CO, NP		
PTX-1848	2020-08-04 Deposition Transcript of Anthony John Iafrate (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00094036-ARCHER00094312	R, 403, C, H, A, LK, CO, NP		
PTX-1849	2020-08-25 Deposition Transcript of Dr. Long Phi Le (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00094951-ARCHER00095315	R, 403, C, H, A, LK, CO, NP		
PTX-1850	2020-08-13 Deposition Transcript of Jill Stefanelli (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00114370-ARCHER00114433	R, 403, C, H, A, LK, CO, NP		
PTX-1851	2020-08-18 Deposition Transcript of Darius Fugere (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00112856-ARCHER00112927	R, 403, C, H, A, LK, CO, NP		
PTX-1852	2020-09-18 Deposition Transcript of Joshua Stahl (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00114747-ARCHER00114830	R, 403, C, H, A, LK, CO, NP		
PTX-1853	2020-08-18 Deposition Transcript of Darius Fugere (revised) (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00112928-ARCHER00113141	R, 403, C, H, A, LK, CO, NP		
PTX-1854	2020-08-13 Deposition Transcript of Jill Stefanelli (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00114434-ARCHER00114625	R, 403, C, H, A, LK, CO, NP		
PTX-1855	2020-09-18 Deposition Transcript of Joshua Stahl (ArcherDX v. Qiagen, D. Del. 18-1019-MN)	ARCHER00114831-ARCHER00115082	R, 403, C, H, A, LK, CO, NP		
PTX-1856	2021-08-23 Trial Transcript, Vol. 2 (ArcherDX v. Qiagen, D. Del. 18-1019-MN)		R, 403, C, H, A, LK, CO, NP		
PTX-1857	2021-08-24 Trial Transcript, Vol. 3 (ArcherDX v. Qiagen, D. Del. 18-1019-MN)		R, 403, C, H, A, LK, CO, NP		
PTX-1858	2021-08-25 Trial Transcript, Vol. 4 (ArcherDX v. Qiagen, D. Del. 18-1019-MN)		R, 403, C, H, A, LK, CO, NP		
PTX-1859	2021-08-26 Trial Transcript, Vol. 5 (ArcherDX v. Qiagen, D. Del. 18-1019-MN)		R, 403, C, H, A, LK, CO, NP		
PTX-1860	2021-08-27 Trial Transcript, Vol. 6 (ArcherDX v. Qiagen, D. Del. 18-1019-MN)		R, 403, C, H, A, LK, CO, NP		
PTX-1861	Intentionally Left Blank		E		
PTX-1862	2020-11-25 Natera's Responses to Archer Interrogatories [Set No. 1]		R, 403, C, H, A, LK, CO, NP		
PTX-1863	PDF of VariantPlexSolidTumor_11426.txt	ARCHER01120797	R, 403, C, H, A, LK, CO		
PTX-1864	FusionPlex Biopstick AST2 LA776.0	ARCHER00050079 - ARCHER00050079	R, 403, C, H, A, LK		
PTX-1865	PDF of FusionPlexSolidTumor_10493.txt	ARCHER01120792	R, 403, C, H, A, LK, CO		
PTX-1866	Archer Attachment 2 Updated IFU for METvar ctDNA Test Kit	ARCHER00044939-ARCHER00044962	R, 403, C, H, A, LK, CO		
PTX-1867	PDF of VariantPlexMyeloid_8401.txt	ARCHER01120796	R, 403, C, H, A, LK, CO		
PTX-1868	2019-09-17 Email from Team Archer to Stahl re Reveal ctDNA is now LiquidPlex	ARCHER02140570	R, 403, C, H, A, LK		
PTX-1869	VariantPlex Myeloid Product Insert LA011.A	ARCHER00092162-ARCHER00092167	R, 403, C, H, A, LK, CO		
PTX-1870	METex14 Test on the RevealDX Assay for RNA IFU-GMSK0002.0 Draft MIB 16 Jul 2019	ARCHER01761503-ARCHER01761537	R, 403, C, H, A, LK		
PTX-1871	Archer DLBCL Assay Module 1 Premarket Approval Application	ARCHER00047728-ARCHER00047754	R, 403, C, H, A, LK, CO		
PTX-1872	2018-07-21 ArcherDX DLBCL: Anchored Multiplex PCR Procedure for RNA PI304182	ARCHER01857906-ARCHER01857921	R, 403, C, H, A, LK, CO		
PTX-1873	Proposed Product Design Control Strategy and Analytical Validation Plan For Debio 1347FGFR Test on the ArcherDX RevealDX Assay Pre-Submission Meeting Request	ARCHER01129870-ARCHER01129948	R, 403, C, H, A, LK, CO		
PTX-1874	Debiopharm FGFR Companion Diagnostic ArcherDX RevealDX Fusion Assay Pre-Market Regulatory Plan	ARCHER01129577-ARCHER01129596	R, 403, C, H, A, LK, CO		
PTX-1875	Journal of Molecular Diagnostics, Cheng, J. 21-4 (July 2019) "Clinical Validation of a Cell-Free DNA Gene Panel"	ARCHER01203753-ARCHER01203766	R, 403, C, H, A, LK		
PTX-1876	VariantPlex CTL Product Insert LA574.B	ARCHER01010621-ARCHER01010623	R, 403, C, H, A, LK		
PTX-1877	ArcherDX DLBCL Assay Meeting Request	ARCHER01319677-ARCHER01319759	R, 403, C, H, A, LK, CO		
PTX-1878	MET Variant Test on the RevealDX Assay System for RNA Instructions for Use	ARCHER01156356-1156387	R, 403, C, H, A, LK		
PTX-1879	U.S. Patent No. 10,017,810 (Iafrate)	ARCHER00052049-ARCHER00052099	R, 403, C, H		
PTX-1880	4eab66aa0_Tms Text File	ARCHER00074672	R, 403, C, H, A, LK, CO		
PTX-1881	6dc8684f4_Tms Text File	ARCHER00074704	R, 403, C, H, A, LK, CO		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1882	6e29def96 Tms Text File	ARCHER00074707	R, 403, C, H, A, LK, CO		
PTX-1883	6fd849cf0 Tms Text File	ARCHER00074712	R, 403, C, H, A, LK, CO		
PTX-1884	7ff339fb Tms Text File	ARCHER00074734	R, 403, C, H, A, LK, CO		
PTX-1885	8d37deeee Tms Text File	ARCHER00074754	R, 403, C, H, A, LK, CO		
PTX-1886	9caac8d92 Tms Text File	ARCHER00074778	R, 403, C, H, A, LK, CO		
PTX-1887	53bf68c5e Tms Text File	ARCHER00074847	R, 403, C, H, A, LK, CO		
PTX-1888	70e3cc674 Tms Text File	ARCHER00074872	R, 403, C, H, A, LK, CO		
PTX-1889	36244f8e0 Tms Text File	ARCHER00075048	R, 403, C, H, A, LK, CO		
PTX-1890	a0681ec15 Tms Text File	ARCHER00075145	R, 403, C, H, A, LK, CO		
PTX-1891	c505afbac Tms Text File	ARCHER00075256	R, 403, C, H, A, LK, CO		
PTX-1892	cb409e014 Tms Text File	ARCHER00075271	R, 403, C, H, A, LK, CO		
PTX-1893	db4be2328 Tms Text File	ARCHER00075315	R, 403, C, H, A, LK, CO		
PTX-1894	ec1eb341d Tms Text File	ARCHER00075378	R, 403, C, H, A, LK, CO		
PTX-1895	2021-01-07 Video of Invitae Presentation on PCM for Melanoma and Lung Cancer Patients	ARCHER00091362	R, 403, C, H, A, LK, CO		
PTX-1896	2021-01-21 Video of Invitae Presentation on Panel Design	ARCHER00091438	E		
PTX-1897	2019-10-17 Email from Druley to Sellaro re Recap of NTRA's Q3 Earnings Call	ARCHER01194668-ARCHER01194670	R, 403, C, H, A, LK, CO		
PTX-1898	2020-10-11 Email from Nishiguchi to Druley re MRD session w/ AZ and MSL role	ARCHER01198823-ARCHER01198828	R, 403, C, H, A, LK, CO, BE		
PTX-1899	Spreadsheet: 2020-05-01 ArcherDX Finance Requests	ARCHER01259107	R, 403, C, H, A, LK, CO		
PTX-1900	2019-05-16 Email from Abbosh to Stahl re ARCHER mrd study network	ARCHER01314845-ARCHER01314847	R, 403, C, H, A, LK, CO		
PTX-1901	2018-04-30 Email from Siok to Stefanelli re AZ Automation	ARCHER01355180	R, 403, C, H, A, LK, CO		
PTX-1902	2020-11-02 Email from Patel to Pant re BMS/ArcherDx Strategic Alignment Discussion	ARCHER01422509	R, 403, C, H, A, LK, CO		
PTX-1903	2021-01-12 AMP Technology & Competitive Positioning Presentation	ARCHER01466327-ARCHER01466364	R, 403, C, H, A, LK, CO		
PTX-1904	2020-04-14 Email from Daber to Myers re Organizing my thoughts	ARCHER02379392-ARCHER02379393	R, 403, C, CO		
PTX-1905	2021-09-27 Ivitae PCM MRD Baseline Report	ARCHER00129949-ARCHER00129950	R, 403, C, H, A, LK, CO		
PTX-1906	Reveal MGH Reveal ctDNA Breast Hotspots CSK0013988-v1.0.gtf	ARCHER00133261	R, 403, C, H, A, LK, CO		
PTX-1907	2017-06-30 Amendment 2 to Exclusive Patent License Agreement A217008.05 between ArcherDx and The General Hospital Corp	ARCHER00129460-ARCHER00129464	R, 403, LP		
PTX-1908	2016-08-15 First Amendment to Exclusive Patent License Agreement A217008.04 between ArcherDX and The General Hospital Corporation	ARCHER01844045-ARCHER01844048	R, 403, LP		
PTX-1909	2013-07-23 Exclusive Patent License Agreement between ArcherDx and The General Hospital Corp	ARCHER01026246-ARCHER01026275	R, 403, LP		
PTX-1910	Intentionally Left Blank				
PTX-1911	Intentionally Left Blank				
PTX-1912	Archer Whole Exome Assay AP0006	ARCHER00091903-ARCHER00091942	R, 403, C, H, A, LK, CO		
PTX-1913	Archer-FusionPlex Library Preparation Best Practices and Troubleshooting Guide APM011.A	ARCHER00091943-ARCHER00091946	R, 403, C, H, A, LK		
PTX-1914	Immunoverse™-HS TCR Protocol LA092.B	ARCHER00091987-ARCHER00092010	R, 403, C, H, A, LK		
PTX-1915	Product Insert, Reveal ctDNA 28 LA173.E	ARCHER00092043-ARCHER00092045	R, 403, C, H, A, LK		
PTX-1916	Product Insert, FusionPlex Myeloid LA184.B	ARCHER00092058-ARCHER00092063	R, 403, C, H, A, LK		
PTX-1917	Product Insert, VariantPlex Core Myeloid LA571.A	ARCHER00092124-ARCHER00092128	R, 403, C, H, A, LK		
PTX-1918	Product Insert VariantPlex Standard Custom BRCA v2 CSA5001 LA769.0	ARCHER00092129-ARCHER00092130	R, 403, C, H, A, LK		
PTX-1919	Product Insert, Reveal Universal ctDNA Custom LA771.0	ARCHER00092143-ARCHER00092144	R, 403, C, H, A, LK		
PTX-1920	Product Insert, FusionPlexCustomFusionPlex FusionPlex Myeloid Focus dSA5865 LA776.0	ARCHER00092147-ARCHER00092148	R, 403, C, H, A, LK		
PTX-1921	Product Insert, FusionPlex NTRK LA776.0	ARCHER00092149-ARCHER00092150	R, 403, C, H, A, LK		
PTX-1922	Product Insert, FusionPlex ARR, LA178.B	ARCHER00092183-ARCHER00092184	R, 403, C, H, A, LK		
PTX-1923	Product Insert, FusionPlex Heme, LA182.B	ARCHER00092185-ARCHER00092190	R, 403, C, H, A, LK		
PTX-1924	Product Insert, FusionPlex Lung, SK0133 LA671.B	ARCHER00092191-ARCHER00092193	R, 403, C, H, A, LK		
PTX-1925	2014-11-17 MGH Details method for Targeted RNA-seq Fusion and Snapshot NGS Assays, genomeweb	ARCHER00095372-ARCHER00095375	R, 403, C, H, A, LK		
PTX-1926	LiquidPlex SeraCare GMini dSA15083-v1.1.gtf	ARCHER00095501	R, 403, C, H, A, LK, CO		
PTX-1927	ArcherDx overview	ARCHER00113933-ARCHER00113945	R, 403, C, H, A, LK		
PTX-1928	2017-07-24 Archer Reveal ctDNA Protocol for Illumina	ARCHER01000515-ARCHER01000532	R, 403, C, H, A, LK		
PTX-1929	2013-10-25 Email from Benoit to Myers re Marketing Content Deck	ARCHER01016177	R, 403, C, H, A, LK, CO		
PTX-1930	ArcherDx Cancer Diagnostics	ARCHER01040369-ARCHER01040420	R, 403, C, H, A, LK		
PTX-1931	2020-09-24 Email from Rondot to Competitive Intelligence re Medicare Issues Draft Local Coverage Determination for Signatera	ARCHER01141108	R, 403, C, H, A, LK, CO		
PTX-1932	Zheng, Zongli (2014) Anchored multiplex PCR for targeted next-generation sequencing, Nature Medicine Vol. 20	ARCHER01189683-ARCHER01189690	R, 403, C, H, A, LK		
PTX-1933	2019-10-25 Email from Myers to Myers re Monitoring	ARCHER01224209	R, 403, C, H, A, LK, CO		
PTX-1934	Archer NovoPiscis Final Configurations for BOM Entry	ARCHER01225167-ARCHER01225171	R, 403, C, H, A, LK		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1935	2019-11-14 Email from Myers to Flynn re Food for thought...	ARCHER01240694	R, 403, C, H, A, LK, CO		
PTX-1936	2019-10-19 Natera Oncology investor call Presentation	ARCHER01240695-ARCHER01240713	R, 403, C, H, A, LK		
PTX-1937	2019-09-10 Email from Stahl to Daber re pre-paid work	ARCHER01279143-ARCHER01279144	R, 403, C		
PTX-1938	2018-11-07 Email from Tillson to Taylor re Myeloid	ARCHER01283457-ARCHER01283462	R, 403, C, H, A, LK, CO		
PTX-1939	2020-01-31 Launch Readiness Review 1 (LRR1) Presentation	ARCHER01294538-ARCHER01294650	R, 403, C, H, A, LK, CO		
PTX-1940	2019-03-22 Email from Washburn to Tilson re Lab Corp's custom DNA assay for the V2 chemistry	ARCHER01417659	R, 403, C, H, A, LK, CO		
PTX-1941	2020-11-06 Email from Myers to George re Natera, Inc.	ARCHER01432789-ARCHER01432790	R, 403, C, H, A, LK, CO		
PTX-1942	STRATAFIDE DNA Assay Procedure AP2.1	ARCHER01522835-ARCHER01522864	R, 403, C, H, A, LK, CO		
PTX-1943	ADX-20-0020 Genosity Study Operations Plan for ArcherDx ICR MRD	ARCHER01541288-ARCHER01541291	R, 403, C, H, A, LK, CO		
PTX-1944	ADX-20-0024 (TD1071 CS1243-20-0075) Study Operations Plan	ARCHER01559352-ARCHER01559355	R, 403, C, H, A, LK, CO		
PTX-1945	Spreadsheet: Plan support for forecast to Tim	ARCHER01588334	R, 403, C, H, A, LK, CO		
PTX-1946	Spreadsheet: 2021-02-26 Base Case- Archer 2021 Operational Plan	ARCHER01638443	R, 403, C, H, A, LK, CO		
PTX-1947	STRATAFIDE DNA Assay Procedure AP3.1	ARCHER01720453-ARCHER01720485	R, 403, C, H, A, LK, CO		
PTX-1948	Spreadsheet: 2021-01-21 PCM Pricing Models	ARCHER01770037	R, 403, C, H, A, LK, CO		
PTX-1949	Spreadsheet: Pharma test forecast template low case	ARCHER01838684	R, 403, C, H, A, LK, CO		
PTX-1950	Spreadsheet: 2020-06-02 Libraries Summary	ARCHER01838911	R, 403, C, H, A, LK, CO		
PTX-1951	Spreadsheet: 2020-12-21 Genosity Forecasting	ARCHER01839298	R, 403, C, H, A, LK, CO		
PTX-1952	Archer FusionPlex Protocol for Illumina LA135.D	ARCHER01844744-ARCHER01844767	R, 403, C, H, A, LK		
PTX-1953	Grenada Goals Presentation	ARCHER01998913-ARCHER01998914	R, 403, C, H, A, LK, CO, I		
PTX-1954	2021-01-29 PCM LDT Concept Presentation	ARCHER01999101-ARCHER01999121	R, 403, C, H, A, LK, CO		
PTX-1955	2020-07-07 Email from Stowell to Close re Pfizer samples (400)	ARCHER02086195	R, 403, C, H, A, LK, CO		
PTX-1956	Stratafide Human Factors Validation Scope, LabCorp	ARCHER02105755-ARCHER02105757	R, 403, C, H, A, LK		
PTX-1957	2020-06-24 IPA Stratafide Human Factors Formative Study between LabCorp and ArcherDX	ARCHER02110488-ARCHER02110490	R, 403, C, H, A, LK, CO		
PTX-1958	Spreadsheet: MRD and CTA Forecast 2020 Updated Invoices	ARCHER02113094	E		
PTX-1959	2019-04-19 Email from Myers to Stahl re Natera breast manuscript	ARCHER022035733	R, 403, C, H, A, LK, CO		
PTX-1960	Spreadsheet: Project Grenada - Management discussion databook	ARCHER02519132	E		
PTX-1961	2020-07-30 Mutual confidentiality agreement between ArcherDx and Genosity	H3 Natera-000013-H3 Natera-000016	R, 403, C, H, A, LK, CO		
PTX-1962	ArcherDX Companion Diagnostic Overview -Myeloid H3B-8800 Presentation	H3 Natera-000062-H3 Natera-000081	R, 403, C, H, A, LK, CO		
PTX-1963	2018-06-28 Work Order No. A-1 H3B-8800 Custom panel between ArcherDx and H3 Biomedicine	H3 Natera-000082-H3 Natera-000090	R, 403, C, H, A, LK, CO		
PTX-1964	2018-06-28 Master Laboratory Services Agreement between H3 Biomedicine and ArcherDx	H3 Natera-000091-H3 Natera-000106	R, 403, C, H, A, LK, CO		
PTX-1965	2018-06-06 Archer FusionPlex Protocol for Illumina LA135.G	H3 Natera-000107-H3 Natera-000130	R, 403, C, H, A, LK, CO		
PTX-1966	2017-09-20 Archer VariantPlex Somatic Protocol for Illumina LA560.B	H3 Natera-000137-H3 Natera-000155	R, 403, C, H, A, LK		
PTX-1967	VariantPlex CFTR Product Insert LA573.A	H3 Natera-000156-H3 Natera-000157	R, 403, C, H, A, LK		
PTX-1968	Analytical and Methodological Validation of the Archer ctDNA Assay with Universal GSPs	H3 Natera-000164-H3 Natera-000219	R, 403, C, H, A, LK, CO		
PTX-1969	2016-08-01 Renewal of Consulting Agreement between ArcherDX and Iafate	Iafate0000001	R, 403, C, H, A, LK, CO		
PTX-1970	2013-08-01 Consulting Agreement between Enxymatics and Iafate	Iafate0000002-Iafate0000010	R, 403, C, H, A, LK, CO, DE		
PTX-1971	2013-08-01 Consulting Agreement between Massachusetts General Hospital and Iafate	Iafate0000011-Iafate0000013	R, 403, C, H, A, LK, CO, DE		
PTX-1972	2016-06-21 Archer Agenda re In-Person SAB meeting	Iafate0000029-Iafate0000031	R, 403, C, H, A, LK, CO		
PTX-1973	2016-06-21 Email from Kudlow to Stahl re Monthly SAB Call	Iafate0000032	R, 403, C, H, A, LK, CO		
PTX-1974	2014-05-08 Email from Le to Iafate re Qiagen	Iafate0000033-Iafate0000034	R, 403, C, H, A, LK, CO		
PTX-1975	2014-05-14 Email from Louis to Iafate re Terms.	Iafate0000035-Iafate0000037	R, 403, C, H, A, LK, CO		
PTX-1976	2014-05-14 Email from Louis to Iafate re Terms.	Iafate0000038-Iafate0000039	R, 403, C, H, A, LK, CO		
PTX-1977	2015-03-13 Email from Iafate to Picone re Extraction optimization - call with Qiagen	Iafate0000040	R, 403, C, H, A, LK, CO		
PTX-1978	2020-10-15 Healthcare Professional Consulting (HCP) Agreement	Iafate0000041-Iafate0000050	R, 403, C, H, A, LK, CO		
PTX-1979	2021-01-21 Seracare Life Sciences ArcherDx Purchase Order 4500022947	SeraCare.0210.01-SeraCare.0210.03	R, 403, C, H, A, LK, CO		
PTX-1980	2021-01-21 Seracare Life Sciences ArcherDx Purchase Order 4500022726	SeraCare.0209.01-SeraCare.0209.02	R, 403, C, H, A, LK, CO		
PTX-1981	LiquidPlex SeraCare GMini dSA15083-v1.0.gtf	SeraCare.0161	I, E		
PTX-1982	18443 VariantPlex SeraCare Myeloid primers targets.bed	SeraCare.0157	I, E		
PTX-1983	2021-01-21 Seracare Life Sciences ArcherDx Purchase Order 4500013615	SeraCare.00174.01-SeraCare.00174.03	R, 403, C, H, A, LK, CO		
PTX-1984	18443 VariantPlex SeraCare Myeloid primers gsp2.bed	SeraCare.0156	I, E		
PTX-1985	2021-01-21 Seracare Life Sciences ArcherDx Purchase Order 4500019762	SeraCare.0202.01-SeraCare.0202.03	R, 403, C, H, A, LK, CO		
PTX-1986	Archer® Reveal ctDNA™ Protocol LA090.A	SeraCare.0001-2.01-SeraCare.0001-2.18	R, 403, C, H, A, LK		
PTX-1987	2020-02-26 Email from Rodenbaugh to Konigshofer re Custom LiquidPlex Panel	SeraCare.0001	R, 403, C, H, A, LK, CO		
PTX-1988	2020-12-21 Email from Dickens to Rodenbaugh re Checking in	SeraCare.0117.01-SeraCare.0117.08	R, 403, C, H, A, LK, CO		
PTX-1989	LiquidPlex SeraCare Gmini Product Insert LA771.1	SeraCare.0001-1.01-SeraCare.0001-1.02	R, 403, C, H, A, LK		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-1990	2016-12-07 Archer Reveal ctDNA Protocol for Illumina LA174.B	SeraCare.0003.1-SeraCare.0003.18	R, 403, C, H, A, LK		
PTX-1991	Spreadsheet: Archer POs January 1, 2018 to date	SeraCare.0215	R, 403, C, H, A, LK, CO		
PTX-1992	Spreadsheet: ArcherDX library information sheet	SeraCare.0167	R, 403, C, H, A, LK, CO		
PTX-1993	2021-03-23 Email from Kobayashi to Konigshofer re SeraCare Custom Myeloid VP Panel	SeraCare.0216	R, 403, C, H, A, LK		
PTX-1994	PDF of VariantPlex SeraCare Custom Heme 18443-v1.0.gtf	SeraCare.0216-3.01-SeraCare.0216-3.81	R, 403, C, H, A, LK, CO		
PTX-1995	PDF of LiquidPlex SeraCare GMini dSA15083-v1.0.gtf	SeraCare.0161.01-SeraCare.0161.11	R, 403, C, H, A, LK, CO		
PTX-1996	PDF of 18443 VariantPlex SeraCare Myeloid primers gsp2.bed	SeraCare.0156.01-SeraCare.0156.54	R, 403, C, H, A, LK, CO		
PTX-1997	LiquidPlex SeraCare Gmini LA771.1	SeraCare.0159.1-SeraCare.0159.2	R, 403, C, H, A, LK		
PTX-1998	Archer Reveal ctDNA Protocol for Illumina LA090.A	SeraCare.0160.1-SeraCare.0160.18	R, 403, C, H, A, LK		
PTX-1999	VariantPlex SeraCare Custom Home LA770.0	SeraCare.0216-2.01-SeraCare.0216-2.02	R, 403, C, H, A, LK		
PTX-2000	PDF of 18443 VariantPlex SeraCare Myeloid primers targets.bed	SeraCare.0157.01-SeraCare.0157.20	R, 403, C, H, A, LK, CO		
PTX-2001	VariantPlex HS/HGC Protocol for Illumina LA560.1	SeraCare.0216-1.1-SeraCare.0216-1.19	R, 403, C, H, A, LK		
PTX-2002	Spreadsheet: ArcherDX library information sheet	SeraCare.0167	R, 403, C, H, A, LK, CO		
PTX-2003	Intentionally Left Blank		R, 403, C, H, A, LK		
PTX-2004	Archer Immunoverse-HS BCR Protocol	SeraCare.0006	R, 403, C, H, A, LK		
PTX-2005	Intentionally Left Blank				
PTX-2006	2014-03-28 Haplotyping Assays Presentation	NAT-AR-00146727-NAT-AR-00146742	R, 403, C, H, A, LK		
PTX-2007	2019-04-17 Clinical Laboratory Services Agreement between Genosity and ArcherDX	GENOSITY00000008-GENOSITY00000024	R, 403, C, H, A, LK, CO		
PTX-2008	2020-11-13 Laboratory Services Statement of Work #3 between Genosity and ArcherDX	GENOSITY00000001-GENOSITY00000007	R, 403, C, H, A, LK, CO, DU, CU		
PTX-2009	ArcherDX LA812.0 MRD Assay for ctDNA Instructions for Use	GENOSITY00000001-GENOSITY00000018	R, 403, C, H, A, LK		
PTX-2010	ArcherDX MRD Assay for ctDNA-2.0. Instructions for Use	GENOSITY00000019-GENOSITY00000046	R, 403, C, H, A, LK, CO		
PTX-2011	2020-06-03 Laboratory Services Statement of Work #2 between Genosity and ArcherDX	GENOSITY00000025-GENOSITY00000029	R, 403, C, DU, CU		
PTX-2012	Genosity Financial Agreement	GENOSITY00000030	R, 403, C, H, A, LK, CO, DE		
PTX-2013	2016-04-07 Laboratory Corporation of America Holdings (LabCorp) Master Agreement between ArcherDX and LabCorp	LabCorp000001-LabCorp000010	R, 403, C, H, A, LK, CO, I		
PTX-2014	2017-11-07 Certified Service Provider Agreement between ArcherDX and LabCorp	LabCorp000011-LabCorp000028	R, 403, C, H, A, LK, CO		
PTX-2015	2018-01-28 Validation Summary for IntelliGEN Myeloid Next Generation Sequencing LDT, ABI9700, MiSeq	LabCorp000184-LabCorp000281	R, 403, C, H, A, LK, CO		
PTX-2016	IntelliGen Heme (AML, MDS, MPD) v1.0 Panel (Archer HemeOnc custom panel) Evaluation	LabCorp000310-LabCorp000344	R, 403, C, H, A, LK, CO		
PTX-2017	IntelliGen Heme Myeloid NGS V1.5 LC-TG-GL-GENE-SOP-0088	LabCorp000345-LabCorp000400	R, 403, C, H, A, LK		
PTX-2018	2018-04-26 Validation Summary Addendum for IntelliGEN Myeloid Next Generation Sequencing LDT	LabCorp000297-LabCorp000305	R, 403, C, H, A, LK, CO		
PTX-2019	Archer VariantPlex Myeloid NGS Assays Information Sheet	LabCorp000401	I, E		
PTX-2020	2020-12-18 Validation Summary for IntelliGEN Myeloid v1.5 Next Generation Sequencing LDT Veriti Thermal Cycler, NextSeq 550	LabCorp000029-LabCorp000183	R, 403, C, H, A, LK, CO		
PTX-2021	Myeloid Statistics (Processes Run Using Reveal ctDNA, VariantPlex, or FusionPlex)	LabCorp000402	R, 403, C, H, A, LK, CO, I?		
PTX-2022	Next generation sequencing of clinical samples from more than 4,200 patients with myeloid malignancies, Integrated oncology	LabCorp000403	R, 403, C, H, A, LK		
PTX-2023	2020-07-28 ArcherDX Invoice INV/2020/1799	TJUH00000032-TJUH00000033	R, 403, C, H, A, LK, CO		
PTX-2024	2019-07-04 ArcherDX Invoice INV/2019/0859	TJUH00000005-TJUH00000006	R, 403, C, H, A, LK, CO		
PTX-2025	2019-06-04 ArcherDX Invoice INV/2019/0801	TJUH00000003-TJUH00000004	R, 403, C, H, A, LK, CO		
PTX-2026	2020-02-06 ArcherDX Invoice INV/2019/2472	TJUH00000013-TJUH00000014	R, 403, C, H, A, LK, CO		
PTX-2027	2020-08-10 ArcherDX Invoice INV/2020/1945	TJUH00000039-TJUH00000040	R, 403, C, H, A, LK, CO		
PTX-2028	2020-01-09 ArcherDX Invoice INV/2019/2229	TJUH00000011-TJUH00000012	R, 403, C, H, A, LK, CO		
PTX-2029	2020-07-28 ArcherDX Invoice INV/2020/1802	TJUH00000034	R, 403, C, H, A, LK, CO		
PTX-2030	2020-04-30 ArcherDX Invoice INV/2020/0456	TJUH00000019-TJUH00000020	R, 403, C, H, A, LK, CO		
PTX-2031	2019-12-27 ArcherDX Invoice INV/2019/2121	TJUH00000010	R, 403, C, H, A, LK, CO		
PTX-2032	2019-11-09 ArcherDX Invoice INV/2019/1744	TJUH00000007-TJUH00000009	R, 403, C, H, A, LK, CO		
PTX-2033	Spreadsheet: ArcherDx Purchase Log molecular lab	TJUH00000048	R, 403, C, H, A, LK, CO		
PTX-2034	2020-02-25 ArcherDX Invoice INV/2020/0328	TJUH00000015-TJUH00000016	R, 403, C, H, A, LK, CO		
PTX-2035	2020-07-13 ArcherDX Invoice INV/2020/1679	TJUH00000030-TJUH00000031	R, 403, C, H, A, LK, CO		
PTX-2036	Spreadsheet: VariantPlex Worksheet- accession number removed	TJUH00000050	R, 403, C, H, A, LK, CO		
PTX-2037	VariantPlex CTL Product Insert LA574.B	TJUH00000062-TJUH00000064	R, 403, C, H, A, LK, DU, CU		
PTX-2038	Spreadsheet: ArcherDx End User Req Status By Vendor	TJUH00000049	R, 403, C, H, A, LK, CO		
PTX-2039	Spreadsheet: FusionPlex CTL worksheet 2020-De-ID	TJUH00000068	R, 403, C, H, A, LK, CO		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-2040	FusionPlex CTL Product Insert LA180.B	TJUH00000059-TJUH00000061	R, 403, C, H, A, LK		
PTX-2041	2019-05-21 CTL FusionPlex Assay Training Agenda	TJUH00000066-TJUH00000067	R, 403, C, H, A, LK		
PTX-2042	Archer Pre-Training Reagent and Equipment Checklist	TJUH00000052-TJUH00000058	R, 403, C, H, A, LK		
PTX-2043	Spreadsheet: Archer PS Data	TJUH00000047	R, 403, C, H, A, LK, CO		
PTX-2044	Spreadsheet: Archer Customer Sample Summary Template	TJUH00000051	R, 403, C, H, A, LK, CO		
PTX-2045	Spreadsheet: 2019-05-21 TJU Sample Summary CTL FP	TJUH00000065	R, 403, C, H, A, LK, CO		
PTX-2046	Intentionally Left Blank				
PTX-2047	Intentionally Left Blank				
PTX-2048	Intentionally Left Blank				
PTX-2049	Intentionally Left Blank				
PTX-2050	Jorgensen, Jan Trost (2021) The Current landscape of the FDA approved companion diagnostics, Translational Oncology 14-101063		R, 403, C, H, A, LK		
PTX-2051	InvisionSeq - Cancer Genome Sequencing - Welcome to Invitae		R, 403, C, H, A, LK		
PTX-2052	ANSI/AAMI 2019 Final Medical Devices Application of Risk Management to Medical Devices		R, 403, C, H, A, LK		
PTX-2053	2014-10-03 Draft Guidance for Industry Oversight re Lab Develop Tests		R, 403, C, H, A, LK		
PTX-2054	2013-12-27 Order No. 84 (ITC 337-TA-868)		R, 403, C, H, A, LK, NP		
PTX-2055	U.S. Patent Application 16/360,843 Docket		R, 403, C, H, A, LK		
PTX-2056	U.S. Patent No. 7,941,151 (Rudolf)		R, 403, C, H, A, LK		
PTX-2057	U.S. Patent No. 10,017,812 (Rabinowitz)		R, 403, C, H, A, LK		
PTX-2058	U.S. Provisional Patent Application No. 61/542,508 File History		R, 403, C, H, A, LK		
PTX-2059	NGS Standards, Genomic Testing, VariantFlexCustomNGSLibrary, SeraCare Webpage		R, 403, C, H, A, LK		
PTX-2060	U.S. Patent Publication 2012/0122701		R, 403, C, H, A, LK		
PTX-2061	Intentionally Left Blank				
PTX-2062	InvisionFirst-Lung -ctDNA Testing for NSCLC		R, 403, C, H, A, LK		
PTX-2063	Intentionally Left Blank				
PTX-2064	Types of Cancer detected, Galleri		R, 403, C, H, A, LK		
PTX-2065	FDA List of Cleared or Approved Companion Diagnostic Devices (In Vitro and Imaging Tools)		R, 403, C, H, A, LK		
PTX-2066	2016-01-21 Email from Zlatkovsky to Stahl re Natera quote and purchase		R, 403, C, H, A, LK, CO		
PTX-2067	2021-05-18 Notice of Deposition of Defendants ArcherDX and Invitae 30(b)(6)		R, 403, C, H, A, LK, CO, NP		
PTX-2068	2015-01-26 Information Disclosure Statement, 14/605,363		R, 403, C, H, A, LK		
PTX-2069	Targeted Gene Fusion Detection Technology for NGS, Paragon Genomics		R, 403, C, H, A, LK		
PTX-2070	U.S. Patent No. 10,590,482 (Ryan)		R, 403, C, H, A, LK		
PTX-2071	2021-08-17 Amoy Diagnostics CDx Gets Japanese Approval to ID NSCLC Patients Eligible for Tepmetko, Genomeweb		R, 403, C, H, A, LK		
PTX-2072	Intentionally Left Blank				
PTX-2073	2020-09-03 Tepotinib in Non-Small Cell Lung Cancer with MET Exon 14 Skipping Mutations, Guardant360 CDx, Publications, New England Journal of Medicine (Tepotinib)		R, 403, C, H, A, LK		
PTX-2074	2020-12-02 Natera's Supp. Responses to Archer Interrogatories [Set No. 1]		R, 403, C, H, A, LK, CO, NP		
PTX-2075	2021-04-30 Defendant's Second Supp. Response to Natera Interrogatory No. 4 [Set No. 1] [Confidential]		R, 403, C, H, A, LK, CO, NP		
PTX-2076	2021-09-03 Defendant's Responses to Natera Admission Request Nos. 1-20 [Set No. 1]		R, 403, C, H, A, LK, CO, NP		
PTX-2077	2020-12-18 ArcherDX First Supp. Responses to Natera Interrogatories Nos 1, 3-6, 8, 13; 3rd to No. 2 [Set No. 1] - Confidential		R, 403, C, H, A, LK, CO, NP		
PTX-2078	2021-05-10 Natera's Fifth Supp. Response to Interrogatory Nos. 1-7 [Set No. 1] (Confidential)		R, 403, C, H, A, LK, CO, NP		
PTX-2079	2021-09-03 Defendant's Responses to Natera Interrogatory No. 6 [Set No. 4]		R, 403, C, H, A, LK, CO, NP		
PTX-2080	2021-05-28 Defendant's Responses to Natera Production Requests Nos. 3-10 [Set No. 2]		R, 403, C, H, A, LK, CO, NP		
PTX-2081	2021-05-10 Natera's First Supp. Response to Defendant's Interrogatory No. 11 [Set no. 4] (Confidential)		R, 403, C, H, A, LK, CO, NP		
PTX-2082	2021-09-03 Supplemental Responses to Natera Interrogatory No. 14 [Set No. 2]; 2021-09-03 (11) Supplemental Responses to Natera Interrogatory Nos. 1 3 4 6 9 10 12 14 [Sets 1 and 2]		R, 403, C, H, A, LK, CO, NP		
PTX-2083	2021-07-09 Responses to Defendant's Interrogatories Nos. 12-25 to Natera [Set No. 5] (Confidential)		R, 403, C, H, A, LK, CO, NP		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-2084	2021-07-20 Defendant's 5th Suppl. Response to Interrogatory No. 2 to and 2nd Supp. Response to Nos. 10-11 [Set No. 1] [Confidential]		R, 403, C, H, A, LK, CO, NP		
PTX-2085	2021-09-03 Natera's Ninth Supp. Responses to Archer Interrogatories - Nos. 1, 4-6 [Set No. 1]		R, 403, C, H, A, LK, CO, NP		
PTX-2086	2021-09-03 Natera's Third Supp. Responses to Archer Interrogatories 8-9 [Set No. 2]		R, 403, C, H, A, LK, CO, NP		
PTX-2087	2020-08-31 Archer's Responses to Natera Production Requests Nos. 1-68 [Set No. 1]		R, 403, C, H, A, LK, CO, NP		
PTX-2088	2021-07-09 Natera's Responses to Defendant's Admission Requests Nos. 1-25 [Set No. 1] (Confidential)		R, 403, C, H, A, LK, CO, NP		
PTX-2089	2021-07-06 Natera Second Supp. Response to Defendants Interrogatory No. 11 [Set No. 4]		R, 403, C, H, A, LK, CO, NP		
PTX-2090	2021-09-03 Natera's Second Supp. Responses to Archer Interrogatory No. 10 [Set No. 3]		R, 403, C, H, A, LK, CO, NP		
PTX-2091	2021-06-04 Defendant's Third Supp. Response to Natera Interrogatory No. 4 [Set No. 1] (Confidential)		R, 403, C, H, A, LK, CO, NP		
PTX-2092	2021-01-07 Responses to Archer's Third Set of Interrogatories, No. 10 [Set No. 3]		R, 403, C, H, A, LK, CO, NP		
PTX-2093	2021-02-16 Defendant's Response to Natera's Amended Interrogatory No. 2 [Set No. 1]		R, 403, C, H, A, LK, CO, NP		
PTX-2094	2021-05-05 Responses to Natera Production Requests Nos. 1-2 to Defendants [Set No. 1] [De-designated]		R, 403, C, H, A, LK, CO, NP		
PTX-2095	2021-03-09 Defendant's Second Supp. Response to Interrogatory 13 - Corrected [Set No. 1] Confidential		R, 403, C, H, A, LK, CO, NP		
PTX-2096	2021-02-16 Defendant's Responses to Natera Production Requests Nos. 136-139 [Set No. 4]		R, 403, C, H, A, LK, CO, NP		
PTX-2097	2021-07-20 Defendant's 5th Supp. Responses to Natera Interrogatory Nos. 10-11 [Set No. 1] [Confidential]		R, 403, C, H, A, LK, CO, NP		
PTX-2098	2021-02-09 Natera's Fourth Supp. Responses to Archer Interrogatories 1-7 - No. 1 [Set No. 1]		R, 403, C, H, A, LK, CO, NP		
PTX-2099	2021-07-30 Defendant's 6th Supp. Responses to Natera Interrogatory 2 and 4th Supp. Response to No. 4 [Set No. 1] - Confidential		R, 403, C, H, A, LK, CO, NP		
PTX-2100	2021-05-28 Defendant's Supp. Response to Interrogatory No. 2 [Set No. 1] - Confidential		R, 403, C, H, A, LK, CO, NP		
PTX-2101	2021-01-12 Natera's Third Supp. Responses to Archer Interrogatories No. 2 [Set No. 1]		R, 403, C, H, A, LK, CO, NP		
PTX-2102	2021-03-12 Natera's Responses to Defendant's Interrogatory No. 11 [Set No. 4]		R, 403, C, H, A, LK, CO, NP		
PTX-2103	2021-04-29 Invitae Responses to Natera Production Requests 1-146 [Set No. 1]		R, 403, C, H, A, LK, CO, NP		
PTX-2104	2021-01-19 ArcherDX Response to Natera Interrogatory No. 14 [Set No. 2]		R, 403, C, H, A, LK, CO, NP		
PTX-2105	2021-02-19 Natera's Second Supp. Responses to Archer Interrogatories 8-9 [Set No. 2]		R, 403, C, H, A, LK, CO, NP		
PTX-2106	2021-05-13 Invitae Responses to Natera Interrogatories 1-5 [Set No. 1] [Confidential]		R, 403, C, H, A, LK, CO, NP		
PTX-2107	2020-11-20 ArcherDX Supp. Response to Natera Interrogatory No. 2 [Set No. 1]		R, 403, C, H, A, LK, CO, NP		
PTX-2108	2021-07-20 Natera's Seventh Supp. Response to Archer interrogatories Nos. 3-7 [Set No. 1] (Confidential)		R, 403, C, H, A, LK, CO, NP		
PTX-2109	2020-11-25 (2) Second Suppl. Responses to Interrogatory No. 2 [Set No. 1]		R, 403, C, H, A, LK, CO, NP		
PTX-2110	2021-01-05 Natera's Second Supp. Responses to Archer Interrogatories - No. 1 [Set No. 1]		R, 403, C, H, A, LK, CO, NP		
PTX-2111	2021-01-19 ArcherDX Responses to Natera Production Requests Nos. 121-135 [Set No. 3]		R, 403, C, H, A, LK, CO, NP		
PTX-2112	Intentionally Left Blank		R, 403, C, H, A, LK, CO, NP		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-2113	2021-09-17 Natera's Second Supp. Responses to Defendant's Interrogatory Nos. 18, 24-25 [Set No. 5]		R, 403, C, H, A, LK, CO, NP		
PTX-2114	2021-04-29 Defendant's Responses to Natera Production Requests Nos. 140-146 [Set No. 5] [Confidential]		R, 403, C, H, A, LK, CO, NP		
PTX-2115	2020-12-18 Natera's Responses to Archer Interrogatories [Set No. 2]		R, 403, C, H, A, LK, CO, NP		
PTX-2116	2021-08-30 ArcherDX Inc. Second Supp. Objections Responses to Plaintiff's Interrogatory No. 5 ;2021-08-30 Second Supp. Responses to Natera Interrogatory No. 5 [Set No. 3] [Confidential]		R, 403, C, H, A, LK, CO, NP		
PTX-2117	2021-09-03 Natera's Supp. Responses to Defendant's Interrogatory Nos. 17, 19, 21-22 [Set No. 5]		R, 403, C, H, A, LK, CO, NP		
PTX-2118	2021-08-16 Defendant's Response to Natera Interrogatory No. 5 [Set No. 3]		R, 403, C, H, A, LK, CO, NP		
PTX-2119	2021-05-13 Defendant's Response to Natera Interrogatory No. 1 [Confidential]		R, 403, C, H, A, LK, CO, NP		
PTX-2120	2020-12-16 ArcherDX Responses to Natera Production Requests Nos. 69-120 [Set No. 2]		R, 403, C, H, A, LK, CO, NP		
PTX-2121	2020-08-31 ArcherDX Responses to Natera Interrogatories Nos. 1-13 [Set No. 1] [Confidential]		R, 403, C, H, A, LK, CO, NP		
PTX-2122	2021-07-06 Natera's Sixth Supp. Response to Archer Interrogatory No. 1 [Set No. 1]		R, 403, C, H, A, LK, CO, NP		
PTX-2123	2021-08-23 Natera's 8th Supp. Responses to Archer Interrogatory No. 1 [Set No. 1]		R, 403, C, H, A, LK, CO, NP		
PTX-2124	2021-03-19 Natera's Supp. Responses to Archer Interrogatory No. 10 [Set No. 3]		R, 403, C, H, A, LK, CO, NP		
PTX-2125	2021-06-24 Defendant's Responses to Natera Interrogatories Nos. 2-4 [Set No. 2] [Confidential]		R, 403, C, H, A, LK, CO, NP		
PTX-2126	2020-12-14 Natera's Corrected Supp. Responses to Archer Interrogatories - No. 1 [Set No. 1]		R, 403, C, H, A, LK, CO, NP		
PTX-2127	2014-07-28 510K guidance		R, 403, C, H, A, LK		
PTX-2128	Somatic Cancer, Cancer Sequencing, SeraCare Webpage		R, 403, C, H, A, LK		
PTX-2129	BostonGene Tumor Portrait™ Tests, Bostongene Webpage		R, 403, C, H, A, LK		
PTX-2130	Solutions, Guardant Health Webpage		R, 403, C, H, A, LK		
PTX-2131	Medical devices - Quality management systems - Requirements for Regulatory Purposes 13485v2016		R, 403, C, H, A, LK		
PTX-2132	Types of Export Certificates, FDA		R, 403, C, H, A, LK		
PTX-2133	PMA Application Contents, FDA		R, 403, C, H, A, LK		
PTX-2134	Premarket Approval (PMA), FDA		R, 403, C, H, A, LK, I		
PTX-2135	PMA Clinical Studies, FDA		R, 403, C, H, A, LK, I		
PTX-2136	2019-12-20 Recommended Content and Format of Non-Clinical Bench Performance Testing Information in Premarket Submissions		R, 403, C, H, A, LK		
PTX-2137	2021-06-03 Press Release: Invitae opens early access to liquid biopsy-based Personalized Cancer Monitoring as a central laboratory service		R, 403, C, H, A, LK		
PTX-2138	Galleri Webpage, Blood Test for Cancer Detection		R, 403, C, H, A, LK		
PTX-2139	1997-03-11 FDA Design Control Guidance For Medical Device Manufacturers		R, 403, C, H, A, LK		
PTX-2140	2021-01-12 [116-2] Archer Technology Webpage	NAT-AR-00803210-NAT-AR-00803213	R, 403, C, H, A, LK		
PTX-2141	2021-01-12 [116-2] Archer LiquidPlex Liquid Biopsy Research Webpage	NAT-AR-00803351-NAT-AR-00803354	R, 403, C, H, A, LK		
PTX-2142	2021-01-12 [116-2] ArcherDX S-1	NAT-AR-00803396-NAT-AR-00803654	R, 403, C, H, A, LK		
PTX-2143	2021-02-05 [133] Answer to Second Consolidated Complaint		R, 403, C, H, NP		
PTX-2144	2021-06-28 [243] Memorandum Opinion re Claim Construction		R, 403, C, H, NP		
PTX-2145	2020-05-13 [21] Answer to Amended Complaint; 2nd Counterclaims		R, 403, C, H, NP		
PTX-2146	2021-01-26 [128] ArcherDX Answer to Second Amended Complaint; Counterclaims		R, 403, C, H, NP		
PTX-2147	2019-08-16 [146] Redacted Memorandum Opinion and Order (<i>Sun Pharm. v. Saptalis</i> , 18-648-WCB)		R, 403, C, H, NP		
PTX-2148	2020-05-15 [437] Report and Recommendation (<i>Guardant Health, Inc. v. Foundation Medicine</i> , 17-1616-LPS)		R, 403, C, H, NP		
PTX-2149	2021-10-22 Rebuttal Expert Report of Robert L. Stoll		R, 403, C, H, NP		
PTX-2150	Appendix A to the Rebuttal Report of Robert Stoll dated December 22, 2021: Stoll CV		R, 403, C, H, NP		
PTX-2151	Appendix B to the Rebuttal Report of Robert Stoll dated December 22, 2021: Material Considered		R, 403, C, H, NP		
PTX-2152	Appendix C to the Rebuttal Report of Robert Stoll dated December 22, 2021: PatSnap Search 1 Results		R, 403, C, H, NP		
PTX-2153	Appendix D to the Rebuttal Report of Robert Stoll dated December 22, 2021: PatSnap Search 2 Results		R, 403, C, H, NP		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-2154	Appendix E to the Rebuttal Report of Robert Stoll dated December 22, 2021: PatSnap Search 3 Results		R, 403, C, H, NP		
PTX-2155	Appendix F to the Rebuttal Report of Robert Stoll dated December 22, 2021: Patent Bots Examiner Bertagna Angela M. Information Sheet		R, 403, C, H, NP		
PTX-2156	2021-10-01 Expert Report of Ryan Sullivan		R, 403, C, H, CO, NP		
PTX-2157	Attachments A-2 through M-15 to the Expert Report of Ryan Sullivan dated October 1, 2021		R, 403, C, H, CO, NP		
PTX-2158	2021-11-19 Reply Expert Report of Ryan Sullivan		R, 403, C, H, CO, NP		
PTX-2159	Attachment A-1b to Reply Expert Report of Ryan Sullivan dated November 19, 2021: Sullivan CV		R, 403, C, H, CO, NP		
PTX-2160	Attachment A-2b to Reply Expert Report of Ryan Sullivan dated November 19, 2021: Materials Considered		R, 403, C, H, CO, NP		
PTX-2161	2021-10-01 Expert Report of John Quackenbush		R, 403, C, H, CO, NP		
PTX-2162	Exhibit 1 to Quackenbush Expert Report dated October 1, 2021: Quackensbush CV		R, 403, C, H, CO, NP		
PTX-2163	Exhibit 2 to the Expert Report of John Quackenbush dated October 1, 2021: 2018-10-16 WO 2017/181202-IPRP1-20181016-7409	NAT-AR-01011169	R, 403, C, H, CO, NP		
PTX-2164	Exhibit 3 to the Expert Report of John Quackenbush dated October 1, 2021: 16/347,134 Application File History	NAT-AR-01011182-NAT-AR-010112012	R, 403, C, H, CO, NP		
PTX-2165	Exhibit 4 to the Expert Report of John Quackenbush dated October 1, 2021: U.S. Patent Application16/092/436 (Zimmermann)	NAT-AR-01011213-NAT-AR-01011244	R, 403, C, H, CO, NP		
PTX-2166	Exhibit 5 to the Expert Report of John Quackenbush dated October 1, 2021: PCT/GB2017/053289		R, 403, C, H, CO, NP		
PTX-2167	2021-11-19 Reply Expert Report of John Quackenbush		R, 403, C, H, CO, NP		
PTX-2168	2021-10-01 Expert Report of Jerzy Wojcik		R, 403, C, H, CO, NP		
PTX-2169	Exhibit 1 to the Expert Report of Jerzy Wojcik dated October 1, 2021: Wojcik CV		R, 403, C, H, CO, NP		
PTX-2170	Exhibit 2 to the Expert Report of Jerzy Wojcik dated October 1, 2021: 2014 Draft-Guidance-for-Industry--Oversight re Lab Develop Tests		R, 403, C, H, CO, NP		
PTX-2171	Exhibit 3 to the Expert Report of Jerzy Wojcik dated October 1, 2021: 510K guidance		R, 403, C, H, CO, NP		
PTX-2172	2021-11-19 Reply Expert Report of Jerzy Wojcik		R, 403, C, H, CO, NP		
PTX-2173	2021-10-22 Expert Report of Paul T. Spellman, Ph.D.		R, 403, C, H, CO, NP		
PTX-2174	Exhibit 1 to Expert Report of Paul T. Spellman, Ph.D. dated October 22, 2021: Spellman CV		R, 403, C, H, CO, NP		
PTX-2175	2022-02-01 Responsive Expert Report of Paul T. Spellman, Ph.D.		R, 403, C, H, CO, NP		
PTX-2176	2021-10-01 Expert Report of Anup Malani		R, 403, C, H, CO, NP		
PTX-2177	Attachment A-1 to Expert Report of Anup Malani dated October 1, 2021: Malani CV		R, 403, C, H, CO, NP		
PTX-2178	Attachment A-2 to Expert Report of Anup Malani dated October 1, 2021: Materials Considered		R, 403, C, H, CO, NP		
PTX-2179	2021-11-19 Reply Expert Report of Anup Malani		R, 403, C, H, CO, NP		
PTX-2180	Attachment B-2 to Expert Report of Anup Malani dated November 19, 2021: Materials Considered		R, 403, C, H, CO, NP		
PTX-2181	2013-10-30 Email from Stahl to Le re Testing current v1 assay	ARCHER01985170-ARCHER01985171	R, 403, C, H, A, LK, CO		
PTX-2182	2014-04-23 Email from Myers to Amsbaugh re Pitch Deck	ARCHER01252995	R, 403, C, H, A, LK, CO		
PTX-2183	2013-07-23 Exclusive Patent License Agreement between ArcherDx and The General Hospital Corporation	ARCHER01026246-ARCHER01026275	R, 403, C, H, A, LK, CO		
PTX-2184	2019-03-22 License Agreement between Becton, Dickinson and Company and ArcherDx	ARCHER00093657-ARCHER00093678	R, 403, C, H, A, LK, CO		
PTX-2185	2021-02-04 DRS: Oncology Presentation	ARCHER01998735-ARCHER01998746	R, 403, C, H, A, LK, CO		
PTX-2186	2020-12-10 Eli Lilly Invitae Overview Presentation	ARCHER01650187-ARCHER01650237	R, 403, C, H, A, LK, CO		
PTX-2187	2013-06-24 Iafrafe Letter to Nature Biotechnology Editor re manuscript entitled "Anchored multiplex PCR for targeted next-generation sequencing"	ARCHER00094429-ARCHER00094430	R, 403, C		
PTX-2188	2014-10-15 Email from Hromadik, M to Rabinowitz, M re Genomeweb article dated October 15, 2014 "Natera Preps Move into Cancer Dx Market as it Continues Building NIPT Capabilities"	NAT-AR-00337902 - NAT-AR-00337908	R, 403, C, H, A, LK, CU, NP, LP		
PTX-2189	2020-06-02 Email from Gilbert, S.to Tsay and Walters re BMS/Celgene Cyber Third Party Risk Assessment	ARCHER02204980-ARCHER02204984	R, 403, C, H, LK, NP, LP		
PTX-2190	Signatera Patient Brochure Molecular Monitoring (MRD)	NAT-AR-00195856-NAT-AR-00195867	R, 403, C, H, A, LK, CU, NP, LP		
PTX-2191	Article: 2008, 03-08 Owczarzy "Predicting Stabiolity of DNA Duplexes in Solutions Containing Magnesium and Monovalent Cations"	NAT-AR-00827345-NAT-AR-00827362	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2192	Natera Website	NAT-AR-00827279-NAT-AR-00827281	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2193	US2013/0303461 A1 Application Publication	NAT-AR-00827293-NAT-AR-00827344	U, R, 403, C		
PTX-2194	Business Wire Article: 2023-02-16 Medicare Extends Coverage of Natera's Signatera™ MRD Test to Breast Cancer	NAT-AR-00827363-NAT-AR-00827365	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2195	2019-02-24 Email from Salari, R. Swenerton re Leicester paper - Seracare validation	NAT-AR-00297403-NAT-AR-00297409	R, 403, C, H, A, LK		
PTX-2196	2019-09-05 Email from Friedman, V. to Zhang, N. re Natera Follow-up	NAT-AR-00193217-NAT-AR-00193218	R, 403, C, H, A, LK		
PTX-2197	Spreadsheet: CM MRD LDT Physican Test Volumes.	ARCHER00134627	R, 403, C, H, LK		
PTX-2198	2022-10-27 Prix Galien USA Nominees	NAT-AR-00827269-NAT-AR-00827278	U, R, 403, C, H, A, LK, CU, NP, LP		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-2199	2021 KWQX (Signatera) Media Award	NAT-AR-00827219-NAT-AR-00827221	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2200	2021 ABC7 (Signatera) Media Award	NAT-AR-00827266-NAT-AR-00827268	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2201	2021 Clinical Lab Products (Signatera awarded ADLT status) Media Award	NAT-AR-00827217-NAT-AR-00827218	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2202	2021 FastCompany World Changing Ideas - Honorable Mention in Health category (Prospera) Media Award	NAT-AR-00827227-NAT-AR-00827229	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2203	2021 Fierce Innovation in Life Sciences Award - Finalists Media Award	NAT-AR-00827230-NAT-AR-00827231	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2204	2021 Good Morning America (Signatera) Media Award	NAT-AR-00827253-NAT-AR-00827255	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2205	2021 MedTech Breakthrough Award - Corporate, Prospera, Organ Health, and Signatera - Winner in Medical Device category, Best New Technology Solution	NAT-AR-00827232-NAT-AR-00827237	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2206	2021 NPR (Signatera) Media Award	NAT-AR-00827246-NAT-AR-00827249	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2207	2021 The ASCO Post (Signatera granted Breakthrough Device Designations) Media Award	NAT-AR-00827250	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2208	2022 ABC 10 Local News (Signatera) Media Award	NAT-AR-00827251-NAT-AR-00827252	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2209	2022 CBS Austin (Signatera) Media Award	NAT-AR-00827241-NAT-AR-00827242	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2210	2022 CBS17 (Signatera) Media Award	NAT-AR-00827243-NAT-AR-00827245	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2211	2022 Fast Company World's Most Innovative Companies (Signatera) Media Award	NAT-AR-00827222-NAT-AR-00827226	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2212	2022 Fight CRC (Natera at the White House in 2022) Media Award	NAT-AR-00827238-NAT-AR-00827240	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2213	2022 Healthline (Natera at the White House in 2022) Media Award	NAT-AR-00827213-NAT-AR-00827216	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2214	2022 Inside Precision Medicine (FoundationOne Tracker Granted Break Through Device Designation) Media Award	NAT-AR-00827256-NAT-AR-00827258	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2215	2023 ABC News (Circulate-Japan) Media Award	NAT-AR-00827203-NAT-AR-00827205	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2216	2023 Cancer Network (Circulate-Japan) Media Award	NAT-AR-00827259-NAT-AR-00827261	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2217	2023 GEN (Circulate-Japan) Media Award	NAT-AR-00827211-NAT-AR-00827212	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2218	2023 bSTAT (Circulate-Japan) Media Award	NAT-AR-00827206-NAT-AR-00827210	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2219	InnovationReport-LS21-Final Media Award	NAT-AR-00827191-NAT-AR-00827202	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2220	Genome Web Article: 2022-02-02 "Natera Awarded Contract to Provide Cancer Testing Services to VA GenomeWeb Media Award"	NAT-AR-00827265	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2221	360Dx Article: 2022-07-14 "Natera Joins UnitedHealthcare's Preferred Lab Network"	NAT-AR-00827264	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2222	Precision Medicine Online Article: 2021-09-08 "Natera Signatera Test to be Used in Study of MRD-Guided Treatment for Colon Cancer Patients Precision Medicine Online"	NAT-AR-00827262-NAT-AR-00827263	U, R, 403, C, H, A, LK, CU, NP, LP		
PTX-2223	Reformatted PTX-0956 Spreadsheet: VariantPlexCTL_9750	NAT-AR-00827289	U, R, 403, C, H, A, LK, CU, NP, LP, BE		
PTX-2224	Reformatted PTX-0957 Spreadsheet FusionPlex CTL 9749	NAT-AR-00827285	U, R, 403, C, H, A, LK, CU, NP, LP, BE		
PTX-2225	Reformatted PTX-0958 Spreadsheet FusionPlex Sarcoma 10466	NAT-AR-00827283	U, R, 403, C, H, A, LK, CU, NP, LP, BE		
PTX-2226	Reformatted PTX-0959 Spreadsheet FusionPlex ORP 12257	NAT-AR-00827287	U, R, 403, C, H, A, LK, CU, NP, LP, BE		
PTX-2227	Reformatted PTX-0960 Spreadsheet STRATAFIDE RNA 12929	NAT-AR-00827288	U, R, 403, C, H, A, LK, CU, NP, LP, BE		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-2228	Reformatted PTX-0961 Spreadsheet FPSolidTumor FusionPlex Solid Tumor 10493	NAT-AR-00827284	U, R, 403, C, H, A, LK, CU, NP, LP, BE		
PTX-2229	Reformatted PTX-0962 Spreadsheet VPSolidTumor VariantPlex Solid Tumor 11426	NAT-AR-00827282	U, R, 403, C, H, A, LK, CU, NP, LP, BE		
PTX-2230	Reformatted PTX-0963 Spreadsheet FPLung_5855 FusionPlex Lung 5855	NAT-AR-00827286	U, R, 403, C, H, A, LK, CU, NP, LP, BE		
PTX-2231	2022-11-09 Letter from Brida to AstraZeneca UK Limited and Astra Zeneca AB re Master Services Agreement Follow Up Letter dated September 8, 2022	ARCHER00134029	R, 403, C, H, LK, LP		
PTX-2232	2018-12-12 Statement of Work between Achilles Therapeutics UK Limited and ArcherDX, LLC re Achilles Custom Liquidplex FE	ARCHER00133965-ARCHER00133969	R, 403, C, H, LK, LP		
PTX-2233	2022-9-8 Letter from Brida (Invitae) to AstraZeneca UK Limited and Astra Zeneca AB re Mermaid-1 and Mermaid-2 Trials	ARCHER00134011-ARCHER00134012	R, 403, C, H, LK, LP		
PTX-2234	2022-09-8 Letter from Brida (Invitae) to AstraZeneca UK Limited and Astra Zeneca AB re Master Services Agreement (July 24, 2019) amd Master Collaboration Agreement (dated April 22,2020)	ARCHER00134025-ARCHER00134026	R, 403, C, H, LK, LP		
PTX-2235	2022-11-9 Letter from Brida (Invitae) to Astra Zeneca UK Limited and Astra Zeneca AB re Mermaid-1 and Mermaid-2 trials	ARCHER00134015-ARCHER00134016	R, 403, C, H, LK, LP		
PTX-2236	2022-11-9 Letter from Brida (Invitae) to Astra Zeneca UK Limited and Astra Zeneca AB re Mermaid-1 and Mermaid-2 trials	ARCHER00134027-ARCHER00134028	R, 403, C, H, LK, LP		
PTX-2237	2022-09-8 Letter from Merck KGaA to Brida (Invitae) re July 18, 2022 Letter	ARCHER00134348-ARCHER00134349	R, 403, C, H, LK, LP		
PTX-2238	2022-11-9 Letter from Brida (Invitae) to Astra Zeneca UK Limited and Astra Zeneca AB re follow-up September 8, 2022 letter	ARCHER00134017	R, 403, C, H, LK, LP		
PTX-2239	2022-07-18 Letter from Brida (Invitae) to Merck KGaA re global strategy	ARCHER00134350-ARCHER00134351	R, 403, C, H, LK, LP		
PTX-2240	AstraZeneca Consolidated First Amendent to Statements of Work 2A and 2B	ARCHER00134042-ARCHER00134044	R, 403, C, H, LK, LP		
PTX-2241	2023-01-19 Email from Kirchofer to Brida re Letter from Invitae Corp	ARCHER00134053	R, 403, C, H, LK, LP		
PTX-2242	2022-09-08 Letter from Brida (Invitae) to AstraZeneca UK Limited and AstraZeneca AB re Mermaid-1 and Mermaid-2	ARCHER00134023-ARCHER00134024	R, 403, C, H, LK, LP		
PTX-2243	2023-01-18 Letter from Brida (Invitae) to AstraZeneca UK Limited and AstraZeneca AB re Master Services Agreement (July 24, 2019)	ARCHER00134054-ARCHER00134055	R, 403, C, H, LK, LP		
PTX-2244	2019-01-19 AstraZeneca Consolidated First Amendent to Statements of Work 2A and 2B	ARCHER00134056-ARCHER00134058	R, 403, C, H, LK, LP		
PTX-2245	2023-09-12 Email from Kirchofer to AstraZeneca re Letters from ArcherDX/Invitae	ARCHER00134034	R, 403, C, H, LK, LP		
PTX-2246	2022-09-08 Letter from Brida (Invitae) to AstraZeneca UK Limited and AstraZeneca AB re Master Services Agreement (July 24, 2019)	ARCHER00134035-ARCHER00134036	R, 403, C, H, LK, LP		
PTX-2247	2022-09-08 Letter from Brida (Invitae) to Astra Zeneca UK Limited and Astra Zeneca AB re Mermaid-1 and Mermaid-2 trials	ARCHER00134037-ARCHER00134038	R, 403, C, H, LK, LP		
PTX-2248	2022-01-18 Letter from Brida (Invitae) to Astra Zeneca UK Limited and Astra Zeneca AB re Master Service Agreement (July 24,2019)	ARCHER00134059-ARCHER00134060	R, 403, C, H, LK, LP		
PTX-2249	2022-09-08 Letter from Brida (Invitae) to Astra Zeneca UK Limited and Astra Zeneca AB re Mermaid-1 and Mermaid-2 trials	ARCHER00134021-ARCHER00134022	R, 403, C, H, LK, LP		
PTX-2250	2022-09-08 Letter from Brida (Invitae) to Astra Zeneca UK Limited and Astra Zeneca AB re Master Service Agreement (July 24, 2019)	ARCHER00134019-ARCHER00134020	R, 403, C, H, LK, LP		
PTX-2251	2022-05-06 Takeda and Archer DX, LLC Statement of Work (Exhibit A)	ARCHER00134618-ARCHER00134626	R, 403, C, H, LK, LP		
PTX-2252	2023-03-02 Statement of Work Quotation to AstraZeneca	ARCHER00134041	R, 403, C, H, LK, LP		
PTX-2253	ArcherDX Contract/PO Review & Approval July 2021-December 2023	ARCHER00134554-ARCHER00134563	R, 403, C, H, LK, LP		
PTX-2254	2022-09-04 Letter from Hoenes to Archer DX, INC re Contract Closeout: CW254437Services Agreement dated October 15, 2020	ARCHER00134537	R, 403, C, H, LK, LP		
PTX-2255	2022-03-15 Service Agreement First Amendment between Merck and Invitae	ARCHER00134250-ARCHER00134253	R, 403, C, H, LK, LP		
PTX-2256	2018-09-27 Project Agreement No.1 between Archer DX, LLXC and Merck KGaA Amendment #7	ARCHER00134377-ARCHER00134380	R, 403, C, H, LK, LP		
PTX-2257	2020-10-16 Novartis Master Agreement	ARCHER00134489-ARCHER00134499	R, 403, C, H, LK, LP		
PTX-2258	2023-03-03 Statement of Work between MedImmune and ArcherDX, LLC 9 Amendment 3 (SOW9A3)	ARCHER00134113-ARCHER00134119	R, 403, C, H, LK, LP		
PTX-2259	2019-05-06 Third Amendment to the Service Agreement between Abbvie and ARCHERDX, INC	ARCHER00133899-ARCHER00133900	R, 403, C, H, LK, LP		
PTX-2260	2021-05-03 Statement of Work between Celgene Corporation and ArcherDX, LLC	ARCHER00134235-ARCHER00134242	R, 403, C, H, LK, LP		
PTX-2261	2021-10-19 Statement of Work between Invitae and REPARE Therapeutics, Inc.	ARCHER00134538-ARCHER00134539	R, 403, C, H, LK, LP		
PTX-2262	2019-07-24 Second Amendment to the Master Service Agreement between AstraZeneca and ArcherDX, LLC	ARCHER00134039-ARCHER00134040	R, 403, C, H, LK, LP		
PTX-2263	2012-05-20 Statement of Work 9 Amendment 2 (SOW9A2)	ARCHER00134104-ARCHER00134108	R, 403, C, H, LK, LP		
PTX-2264	2022-12-06 Email from Gilbert to Kirchofer re BMS PO	ARCHER00134500-ARCHER00134507	R, 403, C, H, LK, LP		
PTX-2265	2022-01-05 Amendment No. 1 to the Project Agreement No. 5 between ArcherDX, LLC and Merck KGaA dated December 20, 2019	ARCHER00134366-ARCHER00134367	R, 403, C, H, LK, LP		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-2266	2021-07-09 Second Amendment to the Non-Clinical Lab Services Agreement between ArcherDX, LLC and Invitae Corporation	ARCHER00133867-ARCHER00133868	R, 403, C, H, LK, LP		
PTX-2267	2021-04-28 Bristol-Myers Squibb and ArcherDX, LLC Statement of Work	ARCHER00134201-ARCHER00134207	R, 403, C, H, LK, LP		
PTX-2268	2019-11-25 Amendment No. 1 to the Project Agreement No. 5 between ArcherDX, LLC and Merck KGaA dated November 25, 2019 and December 20, 2019	ARCHER00134395-ARCHER00134397	R, 403, C, H, LK, LP		
PTX-2269	2021-05-15 Statement of Work 76K Melanoma Project between Archer DX, LLC and Bristol-Myers Squibb Company	ARCHER00134172-ARCHER00134181	R, 403, C, H, LK, LP		
PTX-2270	2023-03-03 Statement of Work between MedImmune and ArcherDX, LLC 9 Amendment 3 (SOW9A3)	ARCHER00134076-ARCHER00134082	R, 403, C, H, LK, LP		
PTX-2271	2020-10-08 Non-Clinical Laboratory Services Agreement between AbbVie Inc. and ArcherDX, LLC	ARCHER00133955-ARCHER00133957	R, 403, C, H, LK, LP		
PTX-2272	2020-07-27 Change Order No.1 to Exhibit the Master Service Agreement between Celgene Corporation and Archer DX, Inc.	ARCHER00134228-ARCHER00134234	R, 403, C, H, LK, LP		
PTX-2273	2018-12-12 Statement of Work between Achilles Therapeutics and ArcherDX, LLC	ARCHER00133975-ARCHER00133980	R, 403, C, H, LK, LP		
PTX-2274	2022-09-22 Letter from Brida (Invitae) to Merck KGaA re Master CDX Agreement dated September 19, 2018	ARCHER00134352-ARCHER00134353	R, 403, C, H, LK, LP		
PTX-2275	2022-09-23 Merck Letter (1).textClipping	ARCHER00134354	R, 403, C, H, LK, LP		
PTX-2276	2022-09-23 Letter from Dabier (Invitae) to Takeda Development Center Americas Inc. and Millenium Pharmaceuticals, Inc. re Master Services Agreement dated Oct.1, 2021	ARCHER00134565	R, 403, C, H, LK, LP		
PTX-2277	2021-04-28 Statement of Work MRD Plasma Extraction Pilot between Bristol Mayers Squibb Company and Archer DX, LLC	ARCHER00134218-ARCHER00134227	R, 403, C, H, LK, LP		
PTX-2278	2022-04-01 Statement of Work Schedule 1- Statement of Work 13 (SOW13) AML MRD Pilot AstraZeneca and Archer DX, LLC	ARCHER00134091-ARCHER00134095	R, 403, C, H, LK, LP		
PTX-2279	2021-12-02 Statement of Work 9 Amendment 2 (SOW9A1) between ArcherDX, LLC and MedImmune LTD	ARCHER00134096-ARCHER00134103	R, 403, C, H, LK, LP		
PTX-2280	2021-11-02 First Amendment Statement of Work 76K Melanoma Project between Archer DX, LLC and Bristol-Myers Squibb Company	ARCHER00134182-ARCHER00134189	R, 403, C, H, LK, LP		
PTX-2281	2021-06-08 Letter from Invitae to Archer re Delegation for Vitro Diagnostic	ARCHER00134061-ARCHER00134062	R, 403, C, H, LK, LP		
PTX-2282	2022-7-18 Letter from Invitae to Bayer re assessment of portfolio	ARCHER00134120	R, 403, C, H, LK, LP		
PTX-2283	2022-09-23 Letter from Dabier (Invitae) to Achilles Therapeutics PLC re Master Services Agreement dated December 12, 2018	ARCHER00133958-ARCHER00133959	R, 403, C, H, LK, LP		
PTX-2284	2022-05-07 Statement of Work Schedule 1- Statement of Work 8 between AstraZeneca and Archer DX, LLC	ARCHER00134067-ARCHER00134072	R, 403, C, H, LK, LP		
PTX-2285	2021-04-20 Statement of Work CA209-915 between Archer DX, LLC and Bristol-Myers Squibb Company	ARCHER00134190-ARCHER00134196	R, 403, C, H, LK, LP		
PTX-2286	2022-10-21 Letter from Brida (Invitae) to Bayer	ARCHER00134124-ARCHER00134125	R, 403, C, H, LK, LP		
PTX-2287	2022-05-05 Merck KGaA and ArcherDX, LLC Amendment No. 1 to Project Agreement No. 5 Dated December 20, 2019	ARCHER00134398-ARCHER00134399	R, 403, C, H, LK, LP		
PTX-2288	2018-09-19 Merck KGaA and ArcherDX, LLC Amendment No. 3 to Project Agreement No. 4 Dated November 19, 2019	ARCHER00134391-ARCHER00134394	R, 403, C, H, LK, LP		
PTX-2289	2021-04-28 Statement of Work between Celgene Internatioal II and Britol-Myers Squib Company	ARCHER00134243-ARCHER00134248	R, 403, C, H, LK, LP		
PTX-2290	2020-02-13 Non-Clinical Laboratory Services Agreement between AbbVie Inc. and ArcherDX, LLC	ARCHER00133901-ARCHER00133904	R, 403, C, H, LK, LP		
PTX-2291	2023-01-23 Statement of Work #6 between Achilles Therapeutics UK Limited and ArcherDX, LLC re Achilles22-01	ARCHER00133960-ARCHER00133964	R, 403, C, H, LK, LP		
PTX-2292	2021-04-23 Schedule 1 Statement of Work 1 Amendment 2 (SOW9A1) between ArcherDX, LLC and AstraZeneca	ARCHER00134063-ARCHER00134066	R, 403, C, H, LK, LP		
PTX-2293	2021-04-06 Statement of Work between Invitae and REPARE Therapeutics, Inc.	ARCHER00134540-ARCHER00134549	R, 403, C, H, LK, LP		
PTX-2294	2022-08-18 Letter from ArcherDX to Celgene Corporation and Novartis Pharm re Attachment 1 AML-MRD Scope of Work-Archer NGS Assay dated August 3, 2020	ARCHER00134424	R, 403, C, H, LK, LP		
PTX-2295	2018-12-12 Statement of Work between Achilles Therapeutics and ArcherDX, LLC	ARCHER00133981-ARCHER00133987	R, 403, C, H, LK, LP		
PTX-2296	2018-12-12 Statement of Work between Achilles Therapeutics and ArcherDX, LLC	ARCHER00133970-ARCHER00133974	R, 403, C, H, LK, LP		
PTX-2297	2019-12-07 Amendment No. 6 to the Project Agreement No. 1 between ArcherDX, LLC and Merck KGaA dated September 27, 2019 and December 20, 2019	ARCHER00134414-ARCHER00134418	R, 403, C, H, LK, LP		
PTX-2298	2022-09-08 Letter from Brida (Invitae) to AstraZeneca UK Limited re Master Services Agreement (July 24, 2019) and Master Collaboration Agreement (April 22, 2020)	ARCHER00134013-ARCHER00134014	R, 403, C, H, LK, LP		
PTX-2299	2021-10-14 Amendment No. 5 to the Project Agreement No. 1 between ArcherDX, LLC and Merck KGaA dated September 27, 2018	ARCHER00134368-ARCHER00134369	R, 403, C, H, LK, LP		
PTX-2300	2021-08-26 Schedule 1 Statement of Work 9 Amendment 2 between ArcherDX, LLC and MedImmune Limited	ARCHER00134083-ARCHER00134090	R, 403, C, H, LK, LP		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-2301	2020-12-17 Amendment No. 3 to the Project Agreement No. 1 between ArcherDX, LLC and Merck KGaA dated September 27, 2018	ARCHER00134355-ARCHER00134365	R, 403, C, H, LK, LP		
PTX-2302	2020-08-03 AML-MRD Scope of Work-Archer NGS assay	ARCHER00134425-ARCHER00134435	R, 403, C, H, LK, LP		
PTX-2303	2021-09-19 Amendment No. 2 to the Project Agreement No. 4 between ArcherDX, LLC and Merck KGaA dated February 23, 2022	ARCHER00134405-ARCHER00134413	R, 403, C, H, LK, LP		
PTX-2304	2020-07-27 Exhibit to Master Service Agreement between Celgene Corporation and ArcherDX, Inc	ARCHER00134436-ARCHER00134449	R, 403, C, H, LK, LP		
PTX-2305	2012-12-12 Master Collaboration Agreement between ArcherDX, LLC and Achilles Therapeutics Limited.	ARCHER00133988-ARCHER00134003	R, 403, C, H, LK, LP		
PTX-2306	2019-07-24 First Amendment to Master Services Agreement between ArcherDX, LLC and AstraZeneca AB	ARCHER00134030-ARCHER00134033	R, 403, C, H, LK, LP		
PTX-2307	2020-10-22 Master Services Agreement between Takeda Development Center Americas, Inc.	ARCHER00134566-ARCHER00134617	R, 403, C, H, LK, LP		
PTX-2308	2020-02 GCP/GLP Services Agreement between ArcherDX, Inc. and Genentech, Inc.	ARCHER00134463-ARCHER00134488	R, 403, C, H, LK, LP		
PTX-2309	2021-04-28 Master Laboratory Services Agreement between BMS and Archer DX, LLC	ARCHER00134126-ARCHER00134171	R, 403, C, H, LK, LP		
PTX-2310	2018-09-27 Project Agreement No.1 between Archer DX, LLC and Merck KGaA Amendment #4	ARCHER00134370-ARCHER00134371	R, 403, C, H, LK, LP		
PTX-2311	2021-04-20 Statement of Work Commercial Pilot Project CGG21-016 between Bristol Mayers Squibb Company and Archer DX, LLC	ARCHER00134208-ARCHER00134216	R, 403, C, H, LK, LP		
PTX-2312	2021-04-05 Non-Clinical Laboratory Services Agreement between AbbVie Inc. and ArcherDX, LLC	ARCHER00133869-ARCHER00133898	R, 403, C, H, LK, LP		
PTX-2313	2019-10-15 Master Service Agreement Celgene Corporatio between ArcherDX	ARCHER00134450-ARCHER00134462	R, 403, C, H, LK, LP		
PTX-2314	2022-09-12 Email from Kirchofer re Gilbert re Letters from ArcherDX/Invitae	ARCHER00134018	R, 403, C, H, LK, LP		
PTX-2315	2022-08-16 Non-Clinical Laboratory Services Agreement between AbbVie Inc. and ArcherDX, LLC	ARCHER00133905-ARCHER00133950	R, 403, C, H, LK, LP		
PTX-2316	2022-01-14 Service Agreement between Invitae Coporation and Merck Sharp & Dohme Corp.	ARCHER00134254-ARCHER00134286	R, 403, C, H, LK, LP		
PTX-2317	Non-Clinical Laboratory Services Agreement between AbbVie Inc. and ArcherDX, LLC	ARCHER00133839-ARCHER00133866	R, 403, C, H, LK, LP		
PTX-2318	2022-09-04 Email from Hoenes to Kirchofer re Closeout Letter CW254437 Services Agreement dated October 15, 2020	ARCHER00134508-ARCHER00134509	R, 403, C, H, LK, LP		
PTX-2319	2022-09-04 Letter from Hoenes to Archer DX, INC re Contract Closeout: CW254437 Services Agreement dated October 15, 2020	ARCHER00134510	R, 403, C, H, LK, LP		
PTX-2320	GCP/GLP Services Agreement CW254437 Fully Executed	ARCHER00134511-ARCHER00134536	R, 403, C, H, LK, LP		
PTX-2321	2021-03-23 Service Agreement Contract MK3475-000 between Archer DX, LLC and Invitae C1051 For Assay Development	ARCHER00134287-ARCHER00134347	R, 403, C, H, LK, LP		
PTX-2322	Business Wire Article: 2023-04-14 "Natera Announces New Signatera MRD Data at 2023 AARC Annual Meeting"	NAT-AR-00827290-NAT-AR-00827292	R, 403, C, H, LK, LP		
PTX-2323	Fed. R. Evid. 1006 Summary Exhibits (to be generated from Plaintiff's existng exhibit list)				
PTX-2324	Additional documents to be produced by Defendants in connection with financials/damages				
PTX-2325	2021-10-31 Declaration of Taylor Jensen ISO LabCorp Production response to Natera Inc.'s subpoena		R, 403, C, H, A, LK, CO		
PTX-2326	2019-05-28 Email from Stahl to Abbosh re slides for Merck	ARCHER001318249	R, 403, C, H, LK, LP		
PTX-2327	2021-02-04 Email from Stahl to Holwick re FW: PCM LDT Impact on CDx proposal	ARCHER001535727-ARCHER001535731	R, 403, C, H, LK, LP		
PTX-2328	2019-03-20 Email from Stefanelli to Stahl re Other indications/MRD	ARCHER001315711-ARCHER001315712	R, 403, C, H, LK, LP		
PTX-2329	2019-03-25 Email from Stahl to Tuffin re Archer-TRACERx PR and agreement amendment	ARCHER02307453-ARCHER02307456	R, 403, C, H, LK, LP		
PTX-2330	2019-01-30 Email from Swanton to Stahl re: Clinical scientist: Collaboration in cDNA evolution between Archer and CRUK TRACERx	ARCHER02123111	R, 403, C, H, LK, LP		
PTX-2331	2021-02-04 Email from Holwick to Close re PCM LDT Impact on CDX proposal	ARCHER001535772-ARCHER001535775	R, 403, C, H, LK, LP		
PTX-2332	2020-03-12 Email from Siferd to Stefanelli re Jackie Parr and AZ SOW4 Matrix MRD 20200219 FINAL PE	ARCHER02186473-ARCHER02186477	R, 403, C, H, LK, LP		
PTX-2333	2020-3-01 Email from Holwich to Stefanelli re Quote for BMS RUO MRD work	ARCHER02134469	R, 403, C, H, LK, LP		
PTX-2334	2020-05-26 Email from Weigel to Gilbert re Archer: BMS Joint Project Team Meeting	ARCHER02205685-ARCHER02205686	R, 403, C, H, LK, LP		
PTX-2335	2020-03-05 Email from Siferd to Harris Re Quote for BMS RUO MRD work	ARCHER02186888	R, 403, C, H, LK, LP		
PTX-2336	Spreadsheet: Financial Fogg 2021-09-17 Ex. 1153	ARCHER00134692	R, 403, C, H, LK, LP		
PTX-2337	2021-11-16 Statement of Work between Bristol Myers Squibb Company and ArcherDX, LLC	ARCHER00134684-ARCHER00134691	R, 403, C, H, LK, LP		
PTX-2338	2021-11-05 Statement of Work between Bristol Myers Squibb Company and ArcherDX, LLC	ARCHER00134676-ARCHER00134683	R, 403, C, H, LK, LP		
PTX-2339	2021-10-18 Statement of Work between Bristol Myers Squibb Company and ArcherDX, LLC	ARCHER00134628-ARCHER00134634	R, 403, C, H, LK, LP		
PTX-2340	2021-07-27 Statement of Work between Bristol Myers Squibb Company and ArcherDX, LLC	ARCHER00134666-ARCHER00134675	R, 403, C, H, LK, LP		
PTX-2341	2021-07-13 Statement of Work Commercial Pilot Project between Bristol Myers Squibb Company and ArcherDX, LLC	ARCHER00134657-ARCHER00134665	R, 403, C, H, LK, LP		
PTX-2342	2021-07-13 Statement of Work Commercial Pilot Project between Bristol Myers Squibb Company and ArcherDX, LLC	ARCHER00134635-ARCHER00134643	R, 403, C, H, LK, LP		
PTX-2343	2020-12-01 Bristol-Myers Squibb First Amendment to Statement of Work CA209-91511	ARCHER00134654-ARCHER00134656	R, 403, C, H, LK, LP		
PTX-2344	2020-06-01 Statement of Work between Bristol-Myers Squibb Company and ArcherDX - Melanoma (CA209-915)	ARCHER00134644-ARCHER00134653	R, 403, C, H, LK, LP		
PTX-2345	2019-06-25 Email from Malhotra to Memon re Request for AZ Review of Sprint Discussion Question for FDA Under Breakthrough	NAT-AR-00176007-NAT-AR-00176019	R, 403, C, H, LK, LP		

Exhibit No.	Description	Bates Number	Archer's Objections	Admitted/Stipulated	Witness
PTX-2347	Asset Purchase Agreement	ARCHER00134693-ARCHER00135785	R, 403, LK, LP		

Archer's Objection Codes		
Description	Abbreviation	Objection
403	403	Prejudice, Misleading, Confusion of Issues, Duplicative, and/or Cumulative (FRE 403)
Settlement offer	408	Inadmissible settlement offer
Attorney-Client	AC	Attorney-Client Privilege or Work Product (FRE 502)
Authenticity	A	The exhibit has not been properly authenticated for admission into evidence. (FRE 104, 901, and 902)
Best Evidence	BE	Best Evidence (FRE 1002-03)
Confusing, Misleading	C	Confusing, misleading, ambiguous, vague, and/or unintelligible (FRE 611(a))
Confidentiality	CO	The exhibit contains confidential business information but is not properly labeled pursuant to the Protective Orders.
Cumulative	CU	Cumulative
Description Error	DE	The descriptive title used for the proposed exhibit is inaccurate, misleading or incomplete.
Duplication	DU	The document is included on the exhibit list more than one time or contains other documents that are included on the exhibit list.
Exhibit not provided	E	Exhibit not provided.
Foreign Language	FL	Foreign Language Document that does not include certified translation.
Hearsay	H	Hearsay (FRE 801, 802, 805)
Improper Opinion	IO	Proposed testimony or exhibit contains improper opinion testimony from a fact witness or improper expert opinion testimony (FRE 701 & 702)
Incomplete	I	The exhibit, as submitted, does not contain the complete document. (FRE 106)
Illegible	IL	The copy of the exhibit provided by Defendants is illegible.
Lacks Foundation	LF/F	There is no foundation for the proposed exhibit or for testimony contained in the exhibit. (FRE 104)
Lacks Knowledge	LK	Proposed testimony or exhibit contains material that is not within the personal knowledge of any witness. (FRE 602)
Limited Purpose	LP	Exhibit may be admissible only for a limited purpose (FRE 105)
Motion in Limine	MIL	Subject to motion to limine
Multiple Documents	MD	Proposed exhibit is actually multiple documents.
Not Proper Evidence	NP	The exhibit is not proper evidence
Relevance	R	Relevance (FRE 401, 402)
Untimely	U	The proposed exhibit was not timely produced (FRCP 26) or contains contentions, opinions, claim construction positions, facts and/or information that were not timely disclosed.

EXHIBIT 11

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
0001			Withdrawn			JTX			
0002			Withdrawn			JTX			
0003			Withdrawn			JTX			
0004			Withdrawn			JTX			
0005			Withdrawn			JTX			
0006			Withdrawn			JTX			
0007			Withdrawn			JTX			
0008			Withdrawn			JTX			
0009			Withdrawn			JTX			
0010			Withdrawn			JTX			
0011			Withdrawn			JTX			
0012			Withdrawn			JTX			
0013			Withdrawn			JTX			
0014			Withdrawn			JTX			
0015			Withdrawn			JTX			
0016			Withdrawn			JTX			
0017			Withdrawn			JTX			
0018			Withdrawn			JTX			
0019			Withdrawn			JTX			
0020			Withdrawn			JTX			
0021			Withdrawn			JTX			
0022			Withdrawn			JTX			
0023			Withdrawn			JTX			
0024			Withdrawn			JTX			
0025			Withdrawn			JTX			
0026			Withdrawn			JTX			
0027			Withdrawn			JTX			
0028			Withdrawn			JTX			
0029			Withdrawn			JTX			
0030			Withdrawn			JTX			
0031			Withdrawn			JTX			
0032			Withdrawn			JTX			
0033			Withdrawn			JTX			
0034			Withdrawn			JTX			
0035			Withdrawn			JTX			
0036			Withdrawn			JTX			
0037			Withdrawn			JTX			
0038			Withdrawn			JTX			
0039			Withdrawn			JTX			
0040			Withdrawn			JTX			
0041			Withdrawn			JTX			
0042			Withdrawn			JTX			
0043			Withdrawn			JTX			
0044			Withdrawn			JTX			
0045			Withdrawn			JTX			
0046			Withdrawn			JTX			
0047			Withdrawn			JTX			
0048			Withdrawn			JTX			
0049			Withdrawn			JTX			
0050			Withdrawn			JTX			
0051			Withdrawn			JTX			
0052			Withdrawn			JTX			
0053			Withdrawn			JTX			
0054			Withdrawn			JTX			
0055			Withdrawn			JTX			
0056			Withdrawn			JTX			
0057			Withdrawn			JTX			
0058			Withdrawn			JTX			
0059			Withdrawn			JTX			
0060			Withdrawn			JTX			
0061			Withdrawn			JTX			
0062			Withdrawn			JTX			
0063			Withdrawn			JTX			
0064		5/18/2011	U.S. Application No. 13/110,685 File History			28 U.S.C. § 1744, MIL, FRE 403, R			
0065			Withdrawn			JTX			
0066		12/22/2011	U.S. Application No. 13/335,043 File History Part 1			28 U.S.C. § 1744, MIL, FRE 403, R			
0067		12/22/2011	U.S. Application No. 13/335,043 File History Part 2			28 U.S.C. § 1744, MIL, FRE 403, R			
0068		11/21/2012	U.S. Application No. 13/683,604 File History			28 U.S.C. § 1744, MIL, FRE 403, R			
0069		2/28/2013	U.S. Application No. 13/760,022 File History			28 U.S.C. § 1744, MIL, FRE 403, R			
0070		3/25/2014	U.S. Application No. 14/225,356 File History			28 U.S.C. § 1744, MIL, FRE 403, R			
0071		11/24/2014	Withdrawn			JTX			
0072		4/21/2015	U.S. Application No. 14/692,703 File History Part 1			28 U.S.C. § 1744, MIL, FRE 403, R			
0073		4/21/2015	U.S. Application No. 14/692,703 File History Part 2			28 U.S.C. § 1744, MIL, FRE 403, R			
0074		4/21/2015	U.S. Application No. 14/692,703 File History Part 3			28 U.S.C. § 1744, MIL, FRE 403, R			
0075		4/21/2015	U.S. Application No. 14/692,703 File History Part 4			28 U.S.C. § 1744, MIL, FRE 403, R			
0076		4/21/2015	U.S. Application No. 14/692,703 File History Part 5			28 U.S.C. § 1744, MIL, FRE 403, R			
0077		10/7/2015	U.S. Application No. 14/877,925 File History			28 U.S.C. § 1744, MIL, FRE 403, R			
0078		10/20/2015	U.S. Application No. 14/918,544 File History Part 1			28 U.S.C. § 1744, MIL, FRE 403, R			
0079		10/20/2015	U.S. Application No. 14/918,544 File History Part 2			28 U.S.C. § 1744, MIL, FRE 403, R			
0080		10/20/2015	U.S. Application No. 14/918,544 File History Part 3			28 U.S.C. § 1744, MIL, FRE 403, R			
0081		10/20/2015	U.S. Application No. 14/918,544 File History Part 4			28 U.S.C. § 1744, MIL, FRE 403, R			
0082		10/20/2015	U.S. Application No. 14/918,544 File History Part 5			28 U.S.C. § 1744, MIL, FRE 403, R			

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
0083		10/20/2015	U.S. Application No. 14/918,544 File History Part 6			28 U.S.C. § 1744, MIL, FRE 403, R			
0084		10/20/2015	U.S. Application No. 14/918,544 File History Part 7			28 U.S.C. § 1744, MIL, FRE 403, R			
0085		9/24/2018	U.S. Application No. 16/140,298 File History Part 1			28 U.S.C. § 1744, MIL, FRE 403, R			
0086		9/24/2018	U.S. Application No. 16/140,298 File History Part 2			28 U.S.C. § 1744, MIL, FRE 403, R			
0087		9/24/2018	U.S. Application No. 16/140,298 File History Part 3			28 U.S.C. § 1744, MIL, FRE 403, R			
0088		9/24/2018	U.S. Application No. 16/140,298 File History Part 4			28 U.S.C. § 1744, MIL, FRE 403, R			
0089		9/24/2018	U.S. Application No. 16/140,298 File History Part 5			28 U.S.C. § 1744, MIL, FRE 403, R			
0090		5/18/2010	Withdrawn			JTX			
0091		6/21/2010	Withdrawn			JTX			
0092		12/22/2010	Withdrawn			JTX			
0093		3/2/2011	Withdrawn			JTX			
0094		2/9/2011	Withdrawn			JTX			
0095		4/12/2011	Withdrawn			JTX			
0096		10/3/2011	Withdrawn			JTX			
0097		6/23/2011	Withdrawn			JTX			
0098		2/29/2012	U.S. Application No. 61/634,431 File History			28 U.S.C. § 1744, MIL, FRE 403, R			
0099		7/24/2012	U.S. Application No. 61/675,020 File History			28 U.S.C. § 1744, MIL, FRE 403, R			
0100		8/15/2012	U.S. Application No. 61/683,331 File History			28 U.S.C. § 1744, MIL, FRE 403, R			
0101		4/21/2014	Withdrawn			JTX			
0102		5/1/2014	Withdrawn			JTX			
0103		5/16/2014	Withdrawn			JTX			
0104		10/21/2014	Withdrawn			JTX			
0105		4/10/2015	U.S. Application No. 62/146,188 File History			28 U.S.C. § 1744, MIL, FRE 403, R			
0106		4/14/2015	U.S. Application No. 62/147,377 File History			28 U.S.C. § 1744, MIL, FRE 403, R			
0107		4/15/2015	U.S. Application No. 62/148,173 File History			28 U.S.C. § 1744, MIL, FRE 403, R			
0108		10/3/2012	U.S. Application No. PCT/US12/58578 File History			28 U.S.C. § 1744, MIL, FRE 403, R			
0109		6/9/2018	U.S. Application No. 16/012,667 File History Part 1			28 U.S.C. § 1744, MIL, FRE 403, R			
0110		6/9/2018	U.S. Application No. 16/012,667 File History Part 2			28 U.S.C. § 1744, MIL, FRE 403, R			
0111		6/9/2018	U.S. Application No. 16/012,667 File History Part 3			28 U.S.C. § 1744, MIL, FRE 403, R			
0112		6/9/2018	U.S. Application No. 16/012,667 File History Part 4			28 U.S.C. § 1744, MIL, FRE 403, R			
0113		6/9/2018	U.S. Application No. 16/012,667 File History Part 5			28 U.S.C. § 1744, MIL, FRE 403, R			
0114		6/9/2018	U.S. Application No. 16/012,667 File History Part 6			28 U.S.C. § 1744, MIL, FRE 403, R			
0115		6/9/2018	U.S. Application No. 16/012,667 File History Part 7			28 U.S.C. § 1744, MIL, FRE 403, R			
0116		6/9/2018	U.S. Application No. 16/012,667 File History Part 8			28 U.S.C. § 1744, MIL, FRE 403, R			
0117		10/27/2016	U.S. Application No. 15/336,630 File History Part 1			28 U.S.C. § 1744, MIL, FRE 403, R			
0118		10/27/2016	U.S. Application No. 15/336,630 File History Part 2			28 U.S.C. § 1744, MIL, FRE 403, R			
0119		10/27/2016	U.S. Application No. 15/336,630 File History Part 3			28 U.S.C. § 1744, MIL, FRE 403, R			
0120		10/27/2016	U.S. Application No. 15/336,630 File History Part 4			28 U.S.C. § 1744, MIL, FRE 403, R			
0121		10/27/2016	U.S. Application No. 15/336,630 File History Part 5			28 U.S.C. § 1744, MIL, FRE 403, R			
0122		4/30/2019	U.S. Application No. 16/399,268 File History Part 1			28 U.S.C. § 1744, MIL, FRE 403, R			
0123		4/30/2019	U.S. Application No. 16/399,268 File History Part 2			28 U.S.C. § 1744, MIL, FRE 403, R			
0124		4/30/2019	U.S. Application No. 16/399,268 File History Part 3			28 U.S.C. § 1744, MIL, FRE 403, R			
0125	HC-AEO	9/27/2021	Invitae PCM MRD Baseline Report [Amato Deposition Ex. 1226]	ARCHER00129947	ARCHER00129948	FRE 403, R			
0126	HC-AEO	9/27/2021	Invitae PCM MRD Baseline Report [Amato Deposition Ex. 1227]	ARCHER00129949	ARCHER00129950	FRE 403, C, R			
0127	HC-AEO	9/27/2021	Invitae PCM MRD Monitoring Report [Amato Deposition Ex. 1228]	ARCHER00130027	ARCHER00130028	FRE 403, C, R			
0128	HC-OCEO	11/13/2020	Genosity Laboratory Services Statement of Work #3 [Amato Deposition Ex. 1229]	GENOSITY00000001	GENOSITY00000007	FRE 105, R, FRE 403			
0129	HC-OAEO	3/10/2020	Letter from E. Burn to R. Philip regarding Re: Request for Study Risk Determination [Amato Deposition Ex. 1230]	ARCHER00044024	ARCHER00044024	FRE 403, C, FRE 1002-1003, H			
0130	HC-AEO	3/27/2020	Initiation Agreement between Bristol-Myers Squibb Company and ArcherDx, Inc. [Amato Deposition Ex. 1231]	ARCHER00130147	ARCHER00130168	FRE 105, R, FRE 403, FN			
0131	HC-AEO		Archer, Statement of Work between Merck Sharpe & Dohme Corp and ArcherDX, LLC [Amato Deposition Ex. 1232]	ARCHER01549693	ARCHER01549701	FRE 403, R, FN			
0132		7/15/2016	Principles for Codevelopment of an In Vitro Companion Diagnostic Device with a Therapeutic Product, https://www.fda.gov/media/99030/download [Amato Deposition Ex. 1233]			FRE 403, R, FN			
0133	HC-OAEO	10/8/2019	Letter from E. Burn to R. Philip regarding Re: Request for Pre-Submission Meeting regarding the Archer MRD Assay [Amato Deposition Ex. 1234]	ARCHER00043821	ARCHER00043821	FRE 403, C, FN, L			
0134	HC-OAEO		Archer, Pre-Submission Meeting Request, Archer MRD Assay [Amato Deposition Ex. 1235]	ARCHER00043822	ARCHER00043858	FRE 403, C, FN			
0135	HC-OAEO	8/28/2019	Archer, MET Variant Test on the RevealDX Assay for ctDNA, Part # SK0138, SK0163, SK0166 [Amato Deposition Ex. 1236]	ARCHER00027414	ARCHER00027435	FRE 403, C, R, FN			
0136			Linkedin Profile of Joshua Babiarz [Babiarz Deposition Ex. 1]			FRE 403, C, FRE1002-1003, MIL			
0137		10/6/2020	U.S. Patent No. 10,793,912 [Babiarz Deposition Ex. 2]			28 U.S.C. § 1744, MIL, FRE 403, R, O, FN			
0138		5/19/2020	U.S. Patent No. 10,655,180 [Babiarz Deposition Ex. 3]			28 U.S.C. § 1744, MIL, FRE 403, R, O, FN			
0139		6/17/2021	Statement by Named Inventor (Joshua Babiarz) Under 37 C.F.R. § 1.324 for Patent No. 10,731,220 [Babiarz Deposition Ex. 7]			28 U.S.C. § 1744, MIL, FRE 403			
0140	HC-AEO	2/5/2014	Email from B. Zimmermann to J. Babiarz regarding RE: AGBT Event Invitation- Presenting Targeted Sequencing for Cancer Research [Babiarz Deposition Ex. 8]	NAT-AR-00200217	NAT-AR-00200219	FRE 403, R, H, MIL			
0141	HC-AEO	4/1/2014	Email from J. Babiarz to md re: Fwd: Miss the AGBT 2014 Gold Sponsor Workshop presentations? [Babiarz Deposition Ex. 9]	NAT-AR-00200199	NAT-AR-00200201	FRE 403, C, H, MIL			
0142	HC-AEO	11/19/2014	Email from J. Babiarz to B. Zimmerman re: Fwd: Webinar: The Value of Richer NGS Data Sets [Babiarz Deposition Ex. 10]	NAT-AR-00153669	NAT-AR-00153671	FRE 403, C, H, MIL			
0143	HC-OAEO	11/22/2019	Deposition of Milena Banjevic In the Matter Of: Illumina Inc. v. Natera, Inc. [Banjevic Deposition Ex. 1]			R, H, DEP, MIL			
0144		6/11/2019	U.S. Patent No. 10,316,362 B2 (Babiarz et al.) [Banjevic Deposition Ex. 2]			28 U.S.C. § 1744, MIL, FRE 403, R, O			
0145		2/24/2021	Expert Declaration of Dr. Jesse Boehm In Support of Defendants' Response to Natera, Inc.'s Opening Claim Construction Brief [Boehm Deposition Ex. 1]			H, FRE 403, R, EXPERT, MIL			
0146		2/3/2021	Expert Declaration of John Quackenbush, Ph. D. [Boehm Deposition Ex. 3]			H, FRE 403, FRE 105, R, EXPERT			
0147		2/00/1985	R.M. Wartell and A.S. Benight, Thermal Denaturation of DNA Molecules: A Comparison of Theory with Experiment, Physics Reports 126, No. 2 (1985) 67-107 [Boehm Deposition Ex. 4]			FRE 403, C, R, MIL			
0148		8/17/2001	N. Von Ahsen et al., Oligonucleotide Melting Temperatures under PCR Conditions: Nearest-Neighbor Corrections for Mg2+, Deoxynucleotide Triphosphates, and Dimethyl Sulfoxide Concentrations with Comparison to Alternative Empirical Formulas, 47 CLINICAL CHEMISTRY (2001) 1956-1961 [Boehm Deposition Ex. 8]			FRE 403, C, R, MIL			
0149		2008	R. Owczarzy et al., Predicting Stability of DNA Duplexes in Solutions Containing Magnesium and Monovalent Cations, 47 BIOCHEMISTRY (2008) 5336-5353 [Boehm Deposition Ex. 9]			FRE 403, R, MIL			

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
0150			"NEB Tm Calculator" accessed from https://tmcaculator.neb.com [Boehm Deposition Ex. 10]			H, FRE 403, C, MIL, R			
0151			"Tm Calculator [Thermo Fisher Scientific – US" accessed from https://www.thermofisher.com/us/en/home/brands/thermoscientific/molecular-biology/molecular-biology-learning-center/molecular-biology-resource-library/thermo-scientific-web-tools/tm-calculator.html. [Boehm Deposition Ex. 11]			H, FRE 403, C, MIL, R			
0152			"Tm Calculator [Oligometting temperature" accessed from https://www.premega.com/resources/tools/biomath/tm-calculator/ [Boehm Deposition Ex. 12]			H, FRE 403, C, MIL, R			
0153			"OligoCalc: Oligonucleotide Properties Calculator" accessed from http://biotools.nubic.northwestern.edu/ [Boehm Deposition Ex. 13]			H, FRE 403, C, MIL, R			
0154		6/30/2010	J.G. Christenbury et al., A method for full genome sequencing of all four serotypes of the dengue virus, 169 JOURNAL OF VIROLOGICAL METHODS (2010) 202-206 [Boehm Deposition Ex. 15]			H, FRE 403, C, MIL, R			
0155		5/10/2021	Defendant's notice of deposition of Natera, Inc. pursuant to federal rule of civil procedure 30(b)(6). Case No. 20-125 (LPS) [Brophy Deposition Ex. 1]			BRPL, H, R, FRE 403, C			
0156	HC-AEO	11/12/2019	Deposition of Michael Brophy In the Matter of: Illumina v. Natera Case No. 3:18-cv-01662-SI [Brophy Deposition Ex. 3]	ARCHER00078819	ARCHER00079133	R, H, DEP, MIL, FN			
0157		00/00/2017 - 00/00/2020	Excel Spreadsheet spreadsheet, "Data Request List..." [Brophy Deposition Ex. 4]	NAT-AR-00265269	NAT-AR-00265269	FRE 403, FRE 105, C, R			
0158			LinkedIn profile of Michael Brophy [Brophy Deposition Ex. 5] [Brophy Deposition Ex. 5]			FRE 403, R, C, FRE1002-1003			
0159		1/7/2021	Natera's response and objections to ArcherDX Inc.'s Third Set of Interrogatories [No. 10] [Brophy Deposition Ex. 6]			BRPL, H, R, FRE 403			
0160	HC-AEO	9/3/2020	Natera presentation "SBR Introduction & Financials" [Brophy Deposition Ex. 7]	NAT-AR-00438424	NAT-AR-00428439	FRE 403, FRE 105, R			
0161	HC-AEO	9/21/2020	Email from S. Moshkevich to M. Brophy, et al. re: "190925 - Signatera v. LUNAR comparison.xlsx" [Brophy Deposition Ex. 8]	NAT-AR-00570158	NAT-AR-00570158	FRE 403, C, FRE 1002-1003, H			
0162	HC-AEO		Excel Spreadsheet Spreadsheet "Signatera LOGO: Raw data, Graphs" [Brophy Deposition Ex. 9]	NAT-AR-00570160	NAT-AR-00570160	FRE 403, FN, R			
0163	HC-AEO	10/15/2020	Email from M. Brophy to S. Chapman re: "more decks" [Brophy Deposition Ex. 10]	NAT-AR-00570251	NAT-AR-00570251	FRE 403, C, FRE 1002-1003, H			
0164	HC-AEO	09/00/2020	Natera presentation "Natera, Inc." [Brophy Deposition Ex. 11]	NAT-AR-00570252	NAT-AR-00570258	FRE 105, C			
0165	HC-AEO	8/5/2020	Natera presentation "Second Quarter 2020 Earnings Presentation" [Brophy Deposition Ex. 12]	NAT-AR-00570259	NAT-AR-00570278	FRE 105, C			
0166		8/4/2021	Natera webpage "Natera Announces Use of Signatera as a Companion Diagnostic in GSK's Phase III ZEST Trial for Niraparib in Early-Stage Breast Cancer" [Brophy Deposition Ex. 13]			FRE 105, C, R, FRE 403			
0167		7/23/2021	Notice of Deposition of Sandra Close [Close Deposition Ex. 1051]			BRPL, H, R, FRE 403			
0168			LinkedIn profile of Sandra Close [Close Deposition Ex. 1052]			FRE 403, C, FRE1002-1003			
0169		2/16/2021	Defendant's Objection and Responses to Interrogatory 2 [Close Deposition Ex. 1053]			BRPL, H, R, FRE 403			
0170		1/19/2020	ArcherDX Inc.'s Objections and Responses to Natera's Second Set of Interrogatories (No. 14) [Close Deposition Ex. 1054]			FRE 403, R, FRE 105, BRPL, H			
0171	HC-OAEO		Archer, BREAKTHROUGH DESIGNATION REQUEST, Archer RevealDx Assay System [Close Deposition Ex. 1055]	ARCHER00043797	ARCHER00043816	FRE 403, R, FRE 105, FN			
0172	HC-OAEO		Archer Document "STUDY RISK DETERMINATION" ArcherDx Metamp Test on Archer RevealDx Assay System" [Close Deposition Ex. 1056]	ARCHER00044389	ARCHER00044403	FRE 403, R, FRE 105, FN			
0173	HC-OAEO		Archer Document "Original Investigation Device Exemption Application ArcherDx MET Variant Test on the RevealDX Assay" [Close Deposition Ex. 1057]	ARCHER00044509	ARCHER00044627	FRE 403, R, FRE 105, FN			
0174	HC-OAEO		Archer, BREAKTHROUGH DESIGNATION REQUEST, Archer MRD Assay [Close Deposition Ex. 1058]	ARCHER00043925	ARCHER00043944	FRE 403, R, FRE 105, FN			
0175	HC-OAEO		Archer, BREAKTHROUGH DESIGNATION REQUEST, Archer MRD Assay [Close Deposition Ex. 1059]	ARCHER00043954	ARCHER00043973	FRE 403, R, FRE 105, FN			
0176	HC-OAEO		Archer, Request for Study Risk Determination: MeRmaid 1, The Archer-MRD-002 Assay Clinical Trial Assay for Detection of Measurable/Minimal Residual Disease in MeRmaid 1 [Close Deposition Ex. 1060]	ARCHER00044025	ARCHER00044043	FRE 403, R, FRE 105, FN			
0177	CONF		Archer Document "Request for Study Risk Determination MeRmaid 2" [Close Deposition Ex. 1061]	ARCHER01143886	ARCHER01143903	FRE 403, R, FRE 105, FN			
0178	HC-AEO		Tudor Constantin, Ph.D. resume [Constantin Deposition Ex. 1]	NAT-AR-00154114	NAT-AR-00154118	FRE 403, C, FRE1002-1003, MIL			
0179		4/21/2015	Declaration (37 CFR 1.63) for Utility or Design Application Using an Application Data Sheet (37 CFR 1.76) "Detecting Mutations and Ploidy in Chromosomal Segments" [Constantin Deposition Ex. 3]			28 U.S.C. § 1744, MIL, FRE 403, R, O			
0180			Substitute Specification (Clean Copy) App. No. 14/692,703 Claims 1-22 [Constantin Deposition Ex. 5]			28 U.S.C. § 1744, MIL, FRE 403, R, O			
0181			Excerpt from U.S. Patent App. No. 14/692,703 File History [Constantin Deposition Ex. 7]			28 U.S.C. § 1744, MIL, FRE 403, R, O			
0182	HC-AEO	8/4/2020	Request for Certificate of Correction Pursuant to 37 C.F.R. section 1.323 on U.S. Patent No. 10,731,220 [Constantin Deposition Ex. 10]	NAT-AR-00703013	NAT-AR-00703043	28 U.S.C. § 1744, MIL, FRE 403, R, O			
0183	HC-AEO	2/9/2016	Email from T. Constantin to I. Zlatkovsky re: "Order Placement: PO 106680 Natera" [Constantin Deposition Ex. 11]	ARCHER00108077	ARCHER00108079	FRE 403, C, R, H, FN, MIL, O			
0184	HC-AEO	2/11/2016	Email from C. Pierson to T. Constantin et al. re: Archer Pre-Site [Constantin Deposition Ex. 12]	ARCHER00108206	ARCHER00108207	FRE 403, C, R, H, FN, MIL, O			
0185	HC-AEO	2/19/2016	Email from I. Zlatkovsky to T. Constantin, et al. re: "Archer Pre-Site" [Constantin Deposition Ex. 13]	ARCHER00108025	ARCHER00108028	FRE 403, C, R, H, FN, MIL, O			
0186	HC-AEO	3/11/2016	Email from I. Zlatkovsky to T. Constantin, et al. regarding Re: Archer Protocol and Training [Constantin Deposition Ex. 14]	ARCHER00108357	ARCHER00108359	FRE 403, C, R, H, FN, MIL, O			
0187	HC-AEO	3/14/2023	Email from C. Pierson to T. Constantin, et al. regarding Re: Archer Protocol and Training [Constantin Deposition Ex. 15]	ARCHER00108360	ARCHER00108362	FRE 403, C, R, H, FN, MIL, O			
0188	HC-AEO	3/9/2016	Email from B. Hoang to C. Pierson, et al. re: "Archer Training" [Constantin Deposition Ex. 16]	ARCHER00108351	ARCHER00108353	FRE 403, C, R, H, FN, MIL, O			
0189	HC-AEO	4/5/2016	Email from C. Pierson to B. Hoang, et al. re: "FusionPlex Results" [Constantin Deposition Ex. 17]	ARCHER00108673	ARCHER00108674	FRE 403, C, R, H, FN, MIL, O			
0190		3/17/2020	Certificate of Correction Patent No. 10,590,482 B2 (Ryan et al.) [Cooper Deposition Ex. 1192]	NAT-AR-00703165	NAT-AR-00703165	28 U.S.C. § 1744, MIL, FRE 403, R, PRIV			
0191		1/16/2018	Amended Transcript of Proceedings Volume 5, Pages 889-1133, Verinata Health, Inc. v. Ariosa Diagnostics, Inc., No C 12-05501, NDCA [Cooper Deposition Ex. 1193]			R, H, DEP, MIL, FRE 403			
0192		10/25/2021	U.S. Patent Application Publication No. 2012/0270212 A1 (Rabinowitz et al.) [Cooper Deposition Ex. 1241]			28 U.S.C. § 1744, MIL, FRE 403			
0193		7/1/2004	U.S. Patent Application Publication No. 2004/0126760 A1 (Broude) [Cooper Deposition Ex. 1242]			28 U.S.C. § 1744, FRE 403			
0194		4/5/2012	International Application Publication No. WO2012/042374 (Taipale et al.) [Cooper Deposition Ex. 1243]			28 U.S.C. § 1745, FRE 403			
0195		5/31/2011	Glenn K. Fu et al. "Counting individual DNA molecules by the stochastic attachment of diverse labels" PNAS Vol. 108 No. 22 [Cooper Deposition Ex. 1244]	ARCHER00051124	ARCHER00051129	FRE 403, R, FN			
0196		6/25/2010	Rebecca C. Iskow et al. "Natural Mutagenesis of Human Genomes by Endogenous Retrotransposons" Cell 141 (2010) [Cooper Deposition Ex. 1245]			FRE 403, R, FN			
0197		1/31/2007	Biochem Genet Article "Encoding PCR Products with Batch-stamps and Barcodes" [Cooper Deposition Ex. 1246]			FRE 403, R, FN			
0198		6/10/2014	U.S. Patent No. 8,748,103 B2 (Faham et al.) [Cooper Deposition Ex. 1247]	ARCHER00122244	ARCHER00122365	28 U.S.C. § 1744, FRE 403, FN, R			
0199		3/8/2008	Richard Owezary et al., Predicting Stability of DNA Duplexes in Solutions Containing Magnesium and Monovalent Cations, Biochemistry 2008, 47, 5336-5353 [Cooper Deposition Ex. 1249]			FRE 403, R, FRE 105, FN			
0200		5/18/2021	Plaintiff Natera Inc.'s Notice of Deposition of Defendants Pursuant to Fed. R. Civ. P. 30(b)(6) [Daber Deposition Ex. 1092]			BRPL, H, R, FRE 403, C			
0201	HC-AEO	5/13/2021	Defendant's Objections and Responses to Interrogatory No. 1 [Daber Deposition Ex. 1093]			BRPL, H, R, FRE 403			
0202	HC-AEO	6/24/2021	Defendant's Objections and Responses to Natera, Inc.'s Second Set of Interrogatories to Defendants (Nos. 2-4) [Daber Deposition Ex. 1094]			BRPL, H, R, FRE 403			

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
0203	HC-AEO	3/6/2020	Genosity Invoice #1219 for Laboratory Services [Daber Deposition Ex. 1095]	ARCHER01816200	ARCHER01816200	FRE 403, R, FRE 105			
0204	HC-AEO	12/30/2019	Genosity Invoice #1149 for Laboratory Services [Daber Deposition Ex. 1096]	ARCHER01983191	ARCHER01983191	FRE 403, R, FRE 105			
0205	HC-AEO	1/10/2020	Genosity Invoice #1165 for Data Management, Sample Processing, Project Management, and Quality [Daber Deposition Ex. 1097]	ARCHER01812985	ARCHER01812985	FRE 403, R, FRE 105			
0206	HC-AEO		Excel Spreadsheet Spreadsheet, Sample Summary [Daber Deposition Ex. 1098]			FRE 403, R, FRE 105			
0207	HC-AEO	00/00/2020 - 00/00/2021	Excel Spreadsheet Spreadsheet "Numbers 21Jan2020 through 02Jun2021" [Daber Deposition Ex. 1099]			FRE 403, R, FRE 105			
0208	HC-AEO		Excel Spreadsheet Spreadsheet, Samples (Active and Pending) [Daber Deposition Ex. 1100]			FRE 403, R, FRE 105			
0209	HC-AEO	8/18/2020	Email from A. Rondot to Competitive Intelligence re: "Genosity CLIA approval announcement" [Daber Deposition Ex. 1101]	ARCHER01970669	ARCHER01970669	FRE 403, R, FRE 105, H			
0210	HC-AEO		Excel Spreadsheet Spreadsheet of Projects and Customers [Daber Deposition Ex. 1102]			FRE 403, R, FRE 105			
0211	HC-AEO	4/17/2019	Genosity document "Laboratory Services Statement of Work Effective Date: November 5, 2020" [Daber Deposition Ex. 1103]	ARCHER00093128	ARCHER00093144	FRE 403, R, FRE 105			
0212	HC-AEO	7/6/2020	Archer Dx document "ArcherDx - Clinical Trial Assay for Stratafide ctDNA Verification and Validation Study: Reproducibility and Repeatability Diagnostic Laboratory Site Readiness Report for Genosity" [Daber Deposition Ex. 1104]	ARCHER01880924	ARCHER01880929	FRE 403, R, FRE 105			
0213			LinkedIn profile of Zachary Demko [Demko Deposition Ex. 1]			R, FRE 403, C, FRE1002-1003, MIL			
0214		6/29/2018	Declaration of Michael L. Metzker for Case No. IPR2018-01317 [Demko Deposition Ex. 2]			R, H, MIL, FRE 403, BPRL, EXPERT			
0215		00/00/2006	Michael L. Metzker et al. "Polymerase Chain Reaction" 5 Encyclopedia of Medical Devices and Instrumentation Second Edition, 380-87 [Demko Deposition Ex. 3]			R, FRE 403, MIL, FRE 403			
0216		1/24/2020	Expert Report of Michael L. Metzker, Illumina, Inc. v. Natera, Inc., Case No. 3:18-CV-01662-SI, NDCA [Demko Deposition Ex. 4]			R, FRE 403, MIL, FRE 403, EXPERT			
0217		5/13/2010	U.S. Patent Application Publication No. 2010/0120038 A1 (Mir et al.) [Demko Deposition Ex. 5]			R, FRE 403, MIL, 28 U.S.C. § 1744			
0218	CONF-AEO	5/29/2020	Deposition of Michael L. Metzker, Illumina, Inc. v. Natera, Inc., Case No. 3:18-CV-01662-SI, NDCA [Demko Deposition Ex. 6]			R, FRE 403, MIL, H, DEP			
0219		7/28/1987	U.S. Patent No. 4,683,195 (Mullis et al.) [Demko Deposition Ex. 8]			R, FRE 403, MIL, 28 U.S.C. § 1744			
0220		6/11/2019	U.S. Patent No. 10,316,362 [Demko Deposition Ex. 9]			R, FRE 403, MIL, 28 U.S.C. § 1744			
0221		1/7/2020	U.S. Patent No. 10,526,658 [Demko Deposition Ex. 10]			R, FRE 403, MIL, 28 U.S.C. § 1744			
0222		3/24/2020	U.S. Patent No. 10,597,723 [Demko Deposition Ex. 11]			R, FRE 403, MIL, 28 U.S.C. § 1744			
0223	HC-AEO	7/20/2021	Natera Inc.'s Seventh Responses and Objections to ArcherDx Inc.'s First Set of Interrogatories [No. 3-7] [Demko Deposition Ex. 15]			BRPL, H, R, FRE 403			
0224	HC-AEO	7/6/2021	Natera Inc.'s Second Supplemental Responses and Objections to Defendant's Fourth Set of Interrogatories [No. 11] [Demko Deposition Ex. 16]			BRPL, H, R, FRE 403			
0225		10/23/2012	U.S. Patent No. 8,296,076 B2 (Fan et al.) [Demko Deposition Ex. 17]			R, FRE 403, MIL, 28 U.S.C. § 1744			
0226	HC-AEO	7/9/2021	Natera, Inc.'s Responses and Objections to Defendants' First Set of Requests for Admissions [No. 1-25] [Demko Deposition Ex. 19]			BRPL, H, R, FRE 403			
0227		5/1/2008	Ting Wei et al. "Novel approaches to mitigate primer interaction and eliminate inhibitors in multiplex PCR, demonstrated using an assay for detection of three strawberry viruses" Journal of Virological Methods 151 (2008) 132-139 [Demko Deposition Ex. 20]			R, FRE 403, MIL			
0228		00/00/1994	Michael A. Frohman "On Beyond Classic RACE (Rapid Amplification of cDNA Ends)" 4 Genome Research, S40-S58 [Demko Deposition Ex. 21]			R, FRE 403, MIL			
0229			LinkedIn profile of Mike Dodd [Dodd Deposition Ex. 1]			R, FRE 403, C, FRE1002-1003, MIL			
0230		11/12/2014	Declaration of Utility or Design Application Using an Application Data Sheet for "Methods for Simultaneous Amplification of Target LOC", U.S. Application No. 14/538,982 [Dodd Deposition Ex. 4]			R, FRE 403, MIL, 28 U.S.C. § 1744			
0231	HC-AEO	8/24/2011	Email from M. Hill to M. Dodd re: DNA Software Support [Dodd Deposition Ex. 5]	NAT-AR-00311066	NAT-AR-00311069	R, FRE 403, FN, H, MIL			
0232		1/12/2021	Second Amended Consolidated Complaint for Patent Infringement for C.A. No. 20-125 [Dodd Deposition Ex. 6]			FRE 105, R, FRE 403, BPRL			
0233		8/21/2015	Declaration of Raheleh Salari Under 37 CFR § 1.132 Appl. No: 14/538,982 [Dodd Deposition Ex. 7]			R, FRE 403, MIL, BPRL, H, EXPERT			
0234			Primer3 Release 2.2.3 Manual [Dodd Deposition Ex. 8]			R, FRE 403, MIL, FRE 105			
0235		6/17/2021	Amended Notice of Deposition of Todd Druley [Druley Deposition Ex. 1010]			BRPL, H, R, FRE 403			
0236		9/11/2020	ArcherDx Inc.'s Disclosures Pursuant to Paragraph 3 of the Default Standard for Discovery [Druley Deposition Ex. 1011]			BRPL, H, R, FRE 403			
0237			Excel Spreadsheet "Assay Totals" [Druley Deposition Ex. 1012]			FRE 105, R, FRE 403, FN			
0238			Excel Spreadsheet with Archer Sales Data [Druley Deposition Ex. 1013]			FRE 105, R, FRE 403, FN			
0239	HC-OAEO		Archer Document "Original Investigation Device Exemption Application ArcherDx MET Variant Test on the RevealDX Assay" [Druley Deposition Ex. 1014]	ARCHER000042366	ARCHER000042494	FRE 105, R, FRE 403, FN			
0240	HC-AEO		Archer Document "ArcherDX MET Variant IVD" [Druley Deposition Ex. 1015]	ARCHER01200839	ARCHER01200849	FRE 105, R, FRE 403, FN			
0241	HC-AEO	9/8/2020	Archer presentation "STRATAFIDE Dx: Launch Readiness Review 2 (LRR2)" [Druley Deposition Ex. 1016]	ARCHER01472337	ARCHER01472521	FRE 105, R, FRE 403, FN			
0242	HC-AEO		Excel Spreadsheet ArcherDx [Druley Deposition Ex. 1017]			FRE 105, R, FRE 403, FN			
0243	HC-AEO	5/24/2020	Email from T. Druley to A. Israyelyan re: "Invitation to participate in ArcherDX Cancer Research Grant" [Druley Deposition Ex. 1018]	ARCHER01197763	ARCHER01197765	FRE 105, R, FRE 403, FN			
0244	HC-AEO		Excel Spreadsheet Spreadsheets about cancer [Druley Deposition Ex. 1019]			FRE 105, R, FRE 403, FN			
0245	HC-AEO		Archer presentation "ArcherDX VariantPlex A new standard in mutation detection" by Holly Tillson [Druley Deposition Ex. 1020]	ARCHER01996888	ARCHER01996941	FRE 105, R, FRE 403, FN			
0246	HC-AEO		Archer FusionPlex Protocol for Illumina [Druley Deposition Ex. 1021]	ARCHER02007774	ARCHER02007799	FRE 105, R, FRE 403, FN			
0247	HC-AEO		Invitae/Archer Presentation "ArcherDX LiquidPlex" [Druley Deposition Ex. 1022]	ARCHER01997146	ARCHER01997169	FRE 105, R, FRE 403, FN			
0248	HC-AEO	12/9/2020	Email from T. Druley to M. Rougier-Chapman re: "Two things" [Druley Deposition Ex. 1023]	ARCHER01428095	ARCHER01428096	FRE 105, R, FRE 403, H, FN			
0249	HC-AEO	12/16/2020	Email from T. Druley to L. McMahon re: "Natera" [Druley Deposition Ex. 1024]	ARCHER01428227	ARCHER01428227	FRE 105, R, FRE 403, H, FN			
0250	HC-AEO	11/30/2020	Email from T. Druley to E. Esplin re: "Biorepository overview" [Druley Deposition Ex. 1025]	ARCHER01541713	ARCHER01541716	FRE 105, R, FRE 403, H, FN			
0251			LinkedIn profile of Lane Eubank [Eubank Deposition Ex. 1]			FRE 403, C, FRE1002-1003, R, MIL			
0252		1/15/2019	U.S. Patent No. 10,179,937 B2 (Babiarz et al.) [Eubank Deposition Ex. 2]			R, FRE 403, MIL, 28 U.S.C. § 1744			
0253		4/21/2015	Declaration (37 CFR 1.63) For Utility or Design Application Using an Application Data Sheet (37 CFR 1.76) Title of Invention "Detecting Mutations and Ploidy in Chromosomal Segments", U.S. Patent Application No. 14/692,703 [Eubank Deposition Ex. 3]			R, FRE 403, 28 U.S.C. § 1744, Q, MIL			
0254			Claims for "A method for determining ploidy of a chromosomal segment..." [Eubank Deposition Ex. 4]			R, FRE 403, 28 U.S.C. § 1744, Q, MIL			
0255		5/10/2021	Defendant's Notice of Deposition of Natera, Inc. Pursuant to Federal Rule of Civil Procedure 30(b)(6) in Case No. 20-125 [Fesko Deposition Ex. 1]			BRPL, H, R, FRE 403, C			
0256			LinkedIn profile of John Fesko [Fesko Deposition Ex. 2]			FRE 403, C, FRE1002-1003, R			
0257	HC-AEO		Natera Oncology Portfolio (2 issued patents and 59 pending patent applications) [Fesko Deposition Ex. 3]	NAT-AR-00147887	NAT-AR-00147890	FRE 403, R, C			
0258	HC-AEO	4/9/2019	Email from J. Fesko to E. Lindquist re: "FDA next steps" [Fesko Deposition Ex. 4]	NAT-AR-00273007	NAT-AR-00273010	FRE 403, R, C, H			
0259		11/10/2014	Zongli Zheng et al. "Anchored multiplex PCR for targeted next-generation sequencing" Nature Medicine Technical Reports [Fesko Deposition Ex. 5]	ARCHER01076135	ARCHER01076142	FRE 403, R, C, MIL			

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
0260			Evaluation of the Archer FusionPlex Solid Tumor Panel in the JAX Cancer Treatment Profile™ [Fesko Deposition Ex. 9]	NAT-AR-00104539	NAT-AR-00104539	FRE 403, R, C			
0261	HC-AEO	11/00/2015	Natera, AMP 2015 Austin Technology Licensing [Fesko Deposition Ex. 10]	NAT-AR-00147813	NAT-AR-00147826	FRE 403, R, C, FN, MIL			
0262	HC-AEO	1/20/2016	Email from G. Brower to Sales regarding Adding Archer to Natera's Purchasing System [Fesko Deposition Ex. 14]	ARCHER01276166	ARCHER01276166	FRE 403, R, C, H			
0263		3/19/2021	Natera, Inc.'s First Supplemental Responses and Objections to ArcherDx, Inc.'s Third Set of Interrogatories [No. 10] [Fesko Deposition Ex. 21]			BRPL, H, R, FRE 403			
0264	HC-AEO	2/20/2019	License Agreement between Natera, Inc., BGI Health (HK) Company Limited, and BGI Genomics Co., Ltd. [Fesko Deposition Ex. 23]	NAT-AR-00441462	NAT-AR-00441515	R, FRE 403			
0265	HC-AEO	8/9/2019	License and Collaboration Agreement by and between Natera, Inc. and Foundation Medicine, Inc. [Fesko Deposition Ex. 24]	NAT-AR-00443488	NAT-AR-00443549	R, FRE 403			
0266	HC-AEO	2019	Genomic Health-Natera Non-Binding Term Sheet with comments [Fesko Deposition Ex. 25]	NAT-AR-00702435	NAT-AR-00702437	R, FRE 403			
0267	HC-AEO	6/00/2015	License Agreement between Natera, Inc. and Clariant Diagnostics Services, Inc. [Fesko Deposition Ex. 26]	NAT-AR-00701953	NAT-AR-00701973	R, FRE 403			
0268	HC-AEO	3/9/2018	License, Development and Distribution Agreement by and among QIAGEN LLC and Natera, Inc. [Fesko Deposition Ex. 27]	NAT-AR-00363988	NAT-AR-00364050	R, FRE 403			
0269	HC-AEO	3/3/2020	Excel Spreadsheet Summary Obligations [Fogg Deposition Ex. 1151]			R, FRE 403			
0270	HC-AEO		Excel Spreadsheet Final Balance Sheet [Fogg Deposition Ex. 1152]			R, FRE 403			
0271	HC-AEO		Excel Spreadsheet Customer List [Fogg Deposition Ex. 1153]			R, FRE 403			
0272	HC-AEO	00/00/2020 - 00/00/2021	Excel Spreadsheet Reaction [Fogg Deposition Ex. 1154]			R, FRE 403			
0273	HC-AEO		Excel Spreadsheet ArcherDX St. Louis Laboratory [Fogg Deposition Ex. 1155]			R, FRE 403			
0274	HC-AEO		Excel Spreadsheet Archer Volume [Fogg Deposition Ex. 1156]			R, FRE 403			
0275	HC-AEO		Excel Spreadsheet Archer Revenue [Fogg Deposition Ex. 1157]			R, FRE 403			
0276	HC-AEO		Excel Spreadsheet Revenue [Fogg Deposition Ex. 1158]			R, FRE 403			
0277	HC-AEO		Excel Spreadsheet ArcherDX, Inc. CDx Revenue and Forecast [Fogg Deposition Ex. 1159]			R, FRE 403			
0278			LinkedIn profile of George Gemelos [Gemelos Deposition Ex. 1]			FRE 403, C, FRE1002-1003, R, MIL			
0279		10/3/2013	U.S. Patent Application Publication No. US2013/0261004 A1 (Ryan et al.) [Gemelos Deposition Ex. 6]			R, FRE 403, 28 U.S.C. § 1744			
0280		00/00/1995	Kenneth H. Roux, "Optimization and Troubleshooting in PCR" Cold Spring Harbor Laboratory ISSN 1054-9805/95 [Gemelos Deposition Ex. 7]			R, FRE 403, FN			
0281		10/14/2020	Plaintiff's Natera, Inc.'s Initial Disclosures [Gemelos Deposition Ex. 8]			BRPL, H, R, FRE 403			
0282	HC-AEO	4/20/2021	Statement of Work between Bristol-Myers Squibb Company and ArcherDX, LLC, Commercial Pilot Project CGG21-016 [Gilbert Deposition Ex. 1184]	ARCHER00132828	ARCHER00132836	R, FRE 403			
0283	HC-AEO	3/27/2020	Statement of Work between Bristol-Myers Squibb Company and ArcherDX, Inc., CA209-816 [Gilbert Deposition Ex. 1185]	ARCHER01577366	ARCHER01577375	R, FRE 403			
0284	HC-AEO	3/27/2020	Statement of Work between Bristol-Myers Squibb Company and ArcherDX, Inc., CA209-915 [Gilbert Deposition Ex. 1186]	ARCHER01577376	ARCHER01577385	R, FRE 403			
0285	HC-AEO	12/11/2020	First Amendment to Statement of Work CA209-015 for ArcherDx for Nivolumab and Ipilimumab [Gilbert Deposition Ex. 1187]	ARCHER00132178	ARCHER00132180	R, FRE 403			
0286	HC-AEO	3/27/2020	Statement of Work CM274 Bladder Project for Bristol-Myers Squibb and ArcherDx [Gilbert Deposition Ex. 1188]	ARCHER01549724	ARCHER01549731	R, FRE 403			
0287	HC-AEO	10/15/2019	Archer Statement of Work 76K Melanoma Project [Gilbert Deposition Ex. 1189]	ARCHER01549654	ARCHER01549662	R, FRE 403			
0288	HC-AEO		Project Schedule No. 1 Master Collaboration Agreement [Gilbert Deposition Ex. 1190]	ARCHER01577296	ARCHER01577328	R, FRE 403			
0289	HC-AEO	8/6/2019	Archer Statement of Work AstraZeneca Minimal Residual Disease (MRD) IDE Project Work Plan [Gilbert Deposition Ex. 1191]	ARCHER01577329	ARCHER01577341	R, FRE 403			
0290	HC-AEO	10/7/2018	Archer Statement of Work 2a [Gilbert Deposition Ex. 1192]	ARCHER01577342	ARCHER01577353	R, FRE 403			
0291	HC-AEO	1/27/2020	Statement of Work 2b: AstraZeneca Minimal Residual Disease (MRD) Clinical Trial Project Work Plan: MeRmaid 2 [Gilbert Deposition Ex. 1193]	ARCHER01577354	ARCHER01577365	R, FRE 403			
0292	HC-AEO	9/30/2020	Schedule 1 - Statement of Work2c - CTA Planning and China HGR Support [Gilbert Deposition Ex. 1194]	ARCHER00092468	ARCHER00092473	R, FRE 403			
0293	HC-AEO	10/28/2020	Statement 1 - Statement of Work 3, Plasma Based MRD Testing in Support of AZ Br.3 Lung Study [Gilbert Deposition Ex. 1195]	ARCHER01550267	ARCHER01550273	R, FRE 403			
0294	HC-AEO		Schedule 1 - Statement of Work 4, Matrix Study, Plasma Based MRD [Gilbert Deposition Ex. 1196]	ARCHER00092533	ARCHER00092538	R, FRE 403			
0295		7/20/2020	Statement of Work 5 - Panel Output File [Gilbert Deposition Ex. 1197]	ARCHER00092718	ARCHER00092723	R, FRE 403			
0296	HC-AEO	7/15/2020	Statement of Work 6 - Breast Feasibility [Gilbert Deposition Ex. 1198]	ARCHER00092474	ARCHER00092477	R, FRE 403			
0297	HC-AEO		Statement of Work 8 - ADAURA Feasibility [Gilbert Deposition Ex. 1199]	ARCHER0156042	ARCHER0150547	R, FRE 403			
0298	HC-AEO	9/30/2020	Statement of Work 1 - Amendment 1 [Gilbert Deposition Ex. 1200]	ARCHER00092494	ARCHER00092497	R, FRE 403			
0299	HC-AEO		Archer Scope of Work #1 [Gilbert Deposition Ex. 1201]	ARCHER01385920	ARCHER01385929	R, FRE 403			
0300	HC-AEO	6/2/2011	Email from M. Rabinowitz to M. Hill re: "miniPCR" [Hill Deposition Ex. 3]	NAT-AR-00131941	NAT-AR-00131944	FRE 403, R, H			
0301		00/00/1993	Robert L. Dorit et al. "One-Sided Anchored Polymerase Chain Reaction for Amplification and Sequencing of Complementary DNA" Methods in Enzymology, Vol. 218, 36-47 (1993) [Hill Deposition Ex. 12]			FRE 403, R, MIL, FN			
0302		4/30/1997	Trudy O. Messmer et al. "Application of a Nested, Multiplex PCR to Psittacosis Outbreaks" 35 Journal of Clinical Microbiology, 2043-46 (1997) [Hill Deposition Ex. 13]			FRE 403, R, MIL, FN			
0303		6/13/2017	U.S. Patent No. 9,677,118 (Zimmerman et al.) [Hill Deposition Ex. 16]			R, FRE 403, 28 U.S.C. § 1744, MIL, O, FN			
0304		5/21/2015	U.S. Patent Office Action Summary for Application No. 14/538,982 by B. Zimmerman [Hill Deposition Ex. 17]			R, FRE 403, 28 U.S.C. § 1744, MIL, O, FN			
0305		8/21/2015	Amendment and Reply Under 37 C.F.R section 1.111 for Natera patent Application 14/538,982 [Hill Deposition Ex. 18]			R, FRE 403, 28 U.S.C. § 1744, MIL, O, FN			
0306		4/16/2019	U.S. Patent No. 10,262,755 B2 (Babiarz et al.) [Hill Deposition Ex. 20]			R, FRE 403, 28 U.S.C. § 1744, MIL, O, FN			
0307		5/18/2021	Plaintiff Natera, Inc.'s Notice of Deposition of Defendants Pursuant to Fed. R. Civ. P. 30(b)(6) [Holwick Deposition Ex. 1081]			FRE 105, R, FRE 403			
0308	HC-AEO	1/25/2021	Invitae presentation "Integrated 2021 Oncology Dev Plan" [Holwick Deposition Ex. 1082]	ARCHER1001403	ARCHER02001438	FRE 105, R, FRE 403			
0309	HC-AEO	3/24/2021	Invitae presentation "BioNTech: TNBC and CRC PCM for Landmark MRD" by L. Montez [Holwick Deposition Ex. 1083]	ARCHER1988121	ARCHER01988124	FRE 105, R, FRE 403			
0310	HC-AEO	3/4/2021	Invitae presentation "PCM Strategy Team" [Holwick Deposition Ex. 1084]	ARCHER02001377	ARCHER02001402	FRE 105, R, FRE 403			
0311		6/1/2011	Exhibit 2 Document "Distribution of In vitro Diagnostic Products Labeled for Research Use Only or Investigational Use Only" [Holwick Deposition Ex. 1085]			FRE 105, R, FRE 403			
0312	HC-AEO	1/14/2021	Invitae presentation "STRATAFIDE CTA Pricing Training" [Holwick Deposition Ex. 1086]	ARCHER01992669	ARCHER01992695	FRE 105, R, FRE 403			
0313	HC-AEO	02/00/2021	Invitae presentation "Regulatory and Quality Update: Distributed Products" [Holwick Deposition Ex. 1087]	ARCHER01518874	ARCHER01518949	FRE 105, R, FRE 403			
0314	HC-AEO	2/4/2021	Email from T. Holwick to S. Gilbert re: "PCM LDT impact on CDx proposal" [Holwick Deposition Ex. 1088]	ARCHER01553746	ARCHER01553748	FRE 105, R, FRE 403, H			

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
0315	HC-AEO	2/1/2021	Email from A. Northcutt to R. Walters, et al. re: "Fwd: P2000043 on Hold Pending Your Response" [Holwick Deposition Ex. 1089]	ARCHER01421648	ARCHER01421689	FRE 105, R, FRE 403, H			
0316	HC-AEO	1/4/2021	Invitae presentation "Pharma Summit #1" [Holwick Deposition Ex. 1090]	ARCHE01998861	ARCHER01998911	FRE 105, R, FRE 403			
0317			LinkedIn page screenshot - Interests showing Companies (including Medtronic, Penn State University...) [Holwick Deposition Ex. 1091]			FRE 105, R, FRE 403			
0318		8/3/2021	Natera Inc.'s Notice of Second Amended Subpoena to Testify at a Deposition in a Civil Action to Laboratory Corporation of America Holdings [Jensen Deposition Ex. 1105]			BRPL, H, R, FRE 403			
0319			Taylor Jensen LinkedIn, https://www.linkedin.com/in/taylorjensen/?fbid=1234 [Jensen Deposition Ex. 1106]			FRE 403, C, FRE1002-1003, R			
0320	HC-AEO	4/7/2016	Master Agreement between Laboratory Corporation of America Holdings and ArcherDX, Inc. [Jensen Deposition Ex. 1107]	LabCorp000001	LabCorp000010	FRE 403, C, R			
0321	HC-AEO	11/7/2017	Certified Service Provider Agreement between ArcherDX, Inc. and Laboratory Corporation of America Holdings [Jensen Deposition Ex. 1108]	LabCorp000011	LabCorp000028	FRE 403, C, R			
0322	HC-AEO	6/24/2020	Individual Project Agreement between Laboratory Corporation of America Holdings and ArcherDX, Inc. [Jensen Deposition Ex. 1109]	ARCHER02110488	ARCHER02110490	FRE 403, C, R			
0323	HC-AEO		Archer VARIANTPlex Myeloid NGS Assays [Jensen Deposition Ex. 1110]	LabCorp000401	LabCorp000401	FRE 403, C, R			
0324	HC-AEO	1/25/2018	LabCorp document titled "Validation Summary for IntelliGEN Myeloid Next Generation Sequencing LDT ABI9700, MiSeq Archer, Applied BioSystems, Illumina R&D/Molecular Oncology/ Molecular Genetics & Genomics" [Jensen Deposition Ex. 1111]	LabCorp000184	LabCorp000281	FRE 403, C, R			
0325	HC-AEO	4/26/2018	LabCorp document titled "Validation Summary Addendum for IntelliGEN Myeloid Next Generation Sequencing LDT ABI 9700, MiSeq, Archer, Applied BioSystems, Illumina, R&D Molecular Oncology/ Molecular Genetics & Genomics" [Jensen Deposition Ex. 1112]	LabCorp000297	LabCorp000305	FRE 403, C, R			
0326	HC-AEO	11/7/2018	Email from H. Tillson to T. Jensen et al. regarding "Re: Re: Myeloid" [Jensen Deposition Ex. 1113]	ARCHER01283457	ARCHER01283481	FRE 403, C, R, H			
0327	HC-AEO	12/18/2020	LabCorp document titled "Validation Summary for IntelliGEN Myeloid v1.5 Next Generation Sequencing LDT Veriti Thermal Cycler, NextSeq 550 ArcherDX, Applied BioSystems, Illumina, R&D/ Molecular Oncology/ Molecular Genetics & Genomics" [Jensen Deposition Ex. 1114]	LabCorp000029	LabCorp000183	FRE 403, C, R			
0328	HC-AEO	1/00/2020 - 3/00/2021	LabCorp document titled "Myeloid Statistics" [Jensen Deposition Ex. 1115]	LabCorp000402	LabCorp000402	FRE 403, C, R			
0329	HC-AEO	6/22/2020 - 6/24/2020	LabCorp poster titled "Next generation sequencing of clinical samples from more than 4,200 patients with myeloid malignancies" Taylor J. Jensen et al. [Jensen Deposition Ex. 1116]	LabCorp000403	LabCorp000403	FRE 403, C, R			
0330	HC-AEO	12/24/2020	LabCorp document number: LC-TG-GL-GENE-SOP-0088 [Jensen Deposition Ex. 1117]	LabCorp000345	LabCorp000400	FRE 403, C, R			
0331			Final Infringement Claim Chart for Archer's Accused Products and the '708 Patent [Kelley Deposition Ex. 1211]			FRE 105, R, FRE 403, MIL			
0332			Nathan K. Kelley Resume [Kelley Deposition Ex. 1214]			FRE 105, R, FRE 403, MIL			
0333		6/25/2020	US Patent and Trademark Office webpage "Foreword" https://www.uspto.gov/web/offices/pac/mppe/mppep-0015-foreword.html [Kelley Deposition Ex. 1215]			FRE 105, R, FRE 403, MIL			
0334		10/20/2021	PatSnap Search 2 Results [Kelley Deposition Ex. 1218]			FRE 105, R, FRE 403, MIL			
0335		10/19/2021	U.S. Patent No. 11,149,308 B2 (Porreca et al.) [Kelley Deposition Ex. 1219]			FRE 105, R, FRE 403, FN, MIL			
0336		10/26/2021	U.S. Patent No. 11,155,863 B2 (Porreca et al.) [Kelley Deposition Ex. 1220]			FRE 105, R, FRE 403, FN, MIL			
0337		10/00/2015	Kirkizlar et al. "Detection of Clonal and Subclonal Copy-Number Variants in Cell-Free DNA from Patients with Breast Cancer Using a Massively Multiplexed PCR Methodology", Translational Oncology, Vol 8, Number 5 pp.407-416, http://dx.doi.org/10.1016/j.tranon.2015.08.004 [Kirkizlar Deposition Ex. 1]			FRE 403, R, MIL, FN			
0338	HC-AEO		Kirkizlar et al. "ConVERGE: A versatile massively multiplexed PCR methodology for cancer-associated copy number variation analysis" [Kirkizlar Deposition Ex. 2]	NAT-AR-00419053	NAT-AR-00419082	FRE 403, R, MIL, FN			
0339		5/31/2018	U.S. Patent Application Publication No. 2018/0148777 A1 (Kirkizlar et al.) [Kirkizlar Deposition Ex. 3]			FRE 403, R, MIL, 28 U.S.C. § 1744			
0340		6/17/2021	Statement by Named Inventor Under 37 C.F.R. § 1.324 Patent No. 10,557,172 [Kirkizlar Deposition Ex. 11]			FRE 105, MIL, R, FRE 403			
0341		6/17/2021	Statement by Named Inventor Under 37 C.F.R. § 1.324 Patent No. 10,538,814 [Kirkizlar Deposition Ex. 12]			FRE 105, MIL, R, FRE 403			
0342	HC-AEO	1/7/2016	Email from J. Van Tornout to T. Constantin et al. regarding ALK fusions in lung cancer - references [Kirkizlar Deposition Ex. 13]	NAT-AR-00153743	NAT-AR-00153748	FRE 403, R, FN, H, MIL			
0343		6/18/2021	Amended Subpoena to Testify at a Deposition in a Civil Action to SeraCare Life Sciences, Inc. [Konigshofer Deposition Ex. 1000]			BRPL, H, R, FRE 403			
0344		1/4/2021	Dynamic List Display Excel Spreadsheet [Konigshofer Deposition Ex. 1001]			FRE 105, R, FRE 403			
0345		00/00/2020 - 00/00/2021	Sample Excel Spreadsheet 2020-2021 [Konigshofer Deposition Ex. 1002]			FRE 105, R, FRE 403			
0346	CONF	9/20/2017	Archer document titled "Archer Reveal ctDNA Protocol for Illumina [Konigshofer Deposition Ex. 1003]	SeraCare.0001-2.1	SeraCare.0001-2.18	FRE 105, R, FRE 403			
0347	CONF	2/26/2020	Email from M. Rodenbaugh to Y. Konigshofer & H. Tillson regarding "Custom LiquidPlex Panel" [Konigshofer Deposition Ex. 1004]	SeraCare.0001	SeraCare.0001	FRE 105, R, FRE 403, H			
0348	CONF		GTF file labeled LIQUIDPLEX_SERACARE_GMINI_DSA15083-V1.0 [Konigshofer Deposition Ex. 1005]	SeraCare.0161	SeraCare.0161	FRE 105, R, FRE 403			
0349	CONF	00/00/2020	Archer document titled "LiquidPlex SeraCare Gmini" [Konigshofer Deposition Ex. 1006]	SeraCare.001-1.1	SeraCare.0001-1.2	FRE 105, R, FRE 403			
0350	CONF	3/23/2021	Email from M. Kobayashi to Y. Konigshofer regarding "SeraCare Custom Myeloid VP Panel" [Konigshofer Deposition Ex. 1007]	SeraCare.0216	SeraCare.0216	FRE 105, R, FRE 403, H			
0351	CONF	11/12/2019	Archer document titled "Archer Variant Plex HS/HGC Protocol for Illumina" [Konigshofer Deposition Ex. 1008]	SeraCare.0216-1.1	SeraCare.0216-1.19	FRE 105, R, FRE 403			
0352		8/7/2018	Archer document titled "Archer Immunoverse -HS BCR Protocol for Illumina" [Konigshofer Deposition Ex. 1009]	SeraCare.0006.1	SeraCare.0006.24	FRE 105, R, FRE 403			
0353			LinkedIn Profile Phil Lacroute [Lacroute Deposition Ex. 1]			FRE 403, C, FRE1002-1003, R, MIL			
0354	HC-AEO	7/20/2021	Natera, Inc.'s seventh supplemental responses and objections to ArcherDX, Inc.'s first set of interrogatories [Nos.3-7] [Lacroute Deposition Ex. 2]			BRPL, H, R, FRE 403			
0355	HC-AEO	3/6/2014	Document titled "Breast Cancer Panel: Mutation Selection and Primer Design" [Lacroute Deposition Ex. 4]	NAT-AR-00146781	NAT-AR-00146817	FRE 403, R, MIL			
0356		11/21/2012	Utility Patent Application Transmittal, Attorney Docket No. 118103-912700/US [Lacroute Deposition Ex. 5]			FRE 403, R, MIL, 28 U.S.C. § 1744			
0357	HC-AEO	4/8/2013	Natera document titled "NIPT Microdeletion Project Primer Pool Design" Phil Lacroute [Lacroute Deposition Ex. 7]	NAT-AR-00133435	NAT-AR-00133453	FRE 403, R, MIL			
0358		2/25/1994	Lawrence A. Haff "Improved Quantitative PCR Using Nested Primers" 3 Genome Research, 332-337 [Lacroute Deposition Ex. 8]			FRE 403, R, MIL, FN			
0359		00/00/1994	Michael A. Froham "On Beyond Classic RACE (Rapid Amplification of cDNA Ends)" Genome Res. 4:S40-S58 [Lacroute Deposition Ex. 9]			FRE 403, R, MIL, FN			
0360			Document containing an Equation [Lacroute Deposition Ex. 10]			FRE 403, R, MIL, FN			
0361		9/14/2021	Notice of Amended Subpoenas for Natera, Inc. v. ArcherDX, Inc., ArcherDX, LLC and Invitae Corp. [Le Deposition Ex. 1174]			BRPL, H, R, FRE 403			
0362		11/12/2019	Archer, VariantPlex-HS/HGC Protocol for Illumina [Le Deposition Ex. 1175]			FRE 105, R, FRE 403			

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
0363		7/9/2020	Archer, LiquidPlex Protocol for Illumina [Le Deposition Ex. 1176] M. Heger "MGH Details Method for Targeted RNA-seq Fusion and Snapshot NGS Assays" Genomeweb https://www.genomeweb.com/sequencing-technology/mgh-details-method-targeted-rna-seq-fusion-and-snapshot-ngs-assays#ZBCtGhbMKUK [Le Deposition Ex. 1177]			FRE 105, R, FRE 403			
0364	HC-AEO	11/17/2014	Amended Complaint in ArcherDX, Inc. and The General Hospital Corporation d/b/a Massachusetts General Hospital v. Defendants (Qiagen Sciences) [Le Deposition Ex. 1182]	ARCHER000095372	ARCHER000095375	FRE 105, R, FRE 403			
0365	HC-AEO	12/2/2011	Email from A. Iafraite to L. Le regarding "re: no subject" [Le Deposition Ex. 1178]	ARCHER000090456	ARCHER000090456	FRE 105, R, FRE 403, MIL, H			
0366	HC-AEO	1/30/2012	Email from L. Le to Z. Zheong regarding "re: sheared dna" [Le Deposition Ex. 1179]	ARCHER000090513	ARCHER000090513	FRE 105, R, FRE 403, H, MIL			
0367		7/10/2018	Complaint in ArcherDX and the General Hospital Corporation d/b/a Massachusetts General Hospital v. Defendants (Qiagen Sciences) [Le Deposition Ex. 1180]	NAT-AR-00707824	NAT-AR-00707872	FRE 105, R, FRE 403, H			
0368		7/10/2018	U.S. Patent No. 10,017,810 (Iafraite et al.) [Le Deposition Ex. 1181]	ARCHER00052049	ARCHER00052099	FRE 403, R, MIL, 28 U.S.C. § 1744			
0369		10/22/2019	Amended Complaint in ArcherDX, Inc. and The General Hospital Corporation d/b/a Massachusetts General Hospital v. Defendants (Qiagen Sciences) [Le Deposition Ex. 1182]	NAT-AR-00708977	NAT-AR-00709035	FRE 105, R, FRE 403, BRPL			
0370		5/17/2012	U.S. Patent Application Publication Pub No. US 2012/0122701 A1 (Ryan et al.) [Le Deposition Ex. 1183]	ARCHER02467220	ARCHER02467496	FRE 105, R, FRE 403, 28 U.S.C. § 1744			
0371	HC-AEO	6/5/2020	United States Securities and Exchange Form S-1 ArcherDX [Malackowski Deposition Ex. 1203]	ARCHER02467220	ARCHER02467496	FRE 403, R			
0372	HC-AEO	10/7/2020	Expert Report of Maria Fe Paz, M.D., Ph.D., M.B.A., C.A. No.: 18-1019-MN ArcherDx v. Qiagen [Malackowski Deposition Ex. 1204]	ARCHER00109149	ARCHER00109177	FRE 105, R, FRE 403, FN, EXPERT			
0373		5/4/2021	United States Securities and Exchange Commission Form 10-Q Invitae Corporation for the quarterly period ended March 31, 2021 [Malackowski Deposition Ex. 1205]			FRE 105, R, FRE 403			
0374	HC-AEO	10/7/2020	Expert Report Raymond S. Sims, C.A. No. 18-1019-MN ArcherDx v. Qiagen [Malackowski Deposition Ex. 1207]	ARCHER00109517	ARCHER00109646	FRE 105, R, FRE 403, FN, EXPERT			
0375	HC-AEO	3/9/2020	License Agreement between UCL Business Ltd and ArcherDx, Inc. [Malackowski Deposition Ex. 1208]	ARCHER01577256	ARCHER01577295	FRE 105, R, FRE 403			
0376			LinkedIn Profile Solomon Moshkevich [Moshkevich Deposition Ex. 1]			FRE 403, C, FRE1002-1003, R			
0377		7/22/2021	U.S. Patent Application Publication No. US2021/022240 A1 ([Moshkevich et al.] [Moshkevich Deposition Ex. 2])			FRE 403, R, MIL, 28 U.S.C. § 1744			
0378	HC-AEO	9/1/2020	Natera Presentation titled "Oncology Roadmap" [Moshkevich Deposition Ex. 3]	NAT-AR-00620634	NAT-AR-00620655	FRE 403, R			
0379	HC-AEO	9/29/2020	Natera Presentation "GM update" by Solomon Moshkevich [Moshkevich Deposition Ex. 13]	NAT-AR-00621191	NAT-AR-00621207	FRE 403, R			
0380	HC-AEO	8/23/2021	Natera, Inc.'s Eighth Supplemental Responses and Objections to ArcherDX, Inc.'s First Set of Interrogatories [No.1] [Moshkevich Deposition Ex. 15]			BRPL, H, R, FRE 403			
0381	HC-AEO	12/19/2019	Deposition Transcript of Solomon Moshkevich, C.A. No. 3:18-cv-01662-SI, Illumina v. Natera [Moshkevich Deposition Ex. 16]	ARCHER00082533	ARCHER00082721	H, FRE 403, R, MIL, DEP			
0382	HC-AEO	6/12/2020	Commercial Assessment Natera [Moshkevich Deposition Ex. 17]	NAT-AR-00121620	NAT-AR-00121636	FRE 403, R, FN			
0383	HC-AEO	3/20/2020	Email from S. Moshkevich to F. Mermon & R. Aniline regarding "RE: GSK Slide for Virtual Meeting [Moshkevich Deposition Ex. 18]	NAT-AR-00616832	NAT-AR-00616836	FRE 403, R, FN, H			
0384	HC-AEO	3/31/2020	Natera Presentation "Natera & GSK Virtual Meeting Breast Cancer MRD, Monitoring and Beyond" [Moshkevich Deposition Ex. 19]	NAT-AR-00616837	NAT-AR-00616916	FRE 403, R, FN			
0385	HC-AEO	00/00/2020	Natera Presentation "Signatera vs Tracerx 2020" [Moshkevich Deposition Ex. 20]	NAT-AR-00619262	NAT-AR-00619270	FRE 403, R, FN			
0386	HC-AEO	6/29/2020	Email from S. Moshkevich to A. Hadd et al. regarding "RE: Quant Controls" [Moshkevich Deposition Ex. 21]	NAT-AR-00152733	NAT-AR-00152735	FRE 403, R, FN, H			
0387	HC-AEO		Archer DX document titled "Overview" [Myers Deposition Ex. 1062]	ARCHER00113933	ARCHER00113945	FRE 105, R, FRE 403			
0388	HC-AEO	10/30/2013	Email from J. Stahl to L. Le et al. regarding "Re: Testing current v1 assay" [Myers Deposition Ex. 1063]	ARCHER01985170	ARCHER01985171	FRE 105, R, FRE 403, H			
0389		1/19/2021	ArcherDX, Inc.'s Objections and Responses to Natera's Second Set of Interrogatories (No.14) [Myers Deposition Ex. 1064]			FRE 105, R, FRE 403, BRPL, H			
0390			Excel spreadsheet containing Archer and Illumina comparisons [Myers Deposition Ex. 1065]			FRE 105, R, FRE 403			
0391	HC-AEO	10/25/2013	Email from C. Benoit to J. Myers et al. regarding "Marketing Content Deck (for collateral generation) [Myers Deposition Ex. 1066]	ARCHER01016177	ARCHER01016195	FRE 105, R, FRE 403, H			
0392	HC-AEO	4/23/2014	Email from J. Myers to J. Amsbaugh regarding "Re: Pitch Deck" [Myers Deposition Ex. 1067]	ARCHER01252995	ARCHER01253042	FRE 105, R, FRE 403, H			
0393	HC-AEO	7/30/2021	Defendants' Sixth Supplemental Objections and Responses to Interrogatory No.2 and Fourth Supplemental Objections and Response to Interrogatory No.4 [Myers Deposition Ex. 1068]			BRPL, H, R, FRE 403			
0394	HC-AEO	3/00/2021	Invitae presentation "Project Grenada" [Myers Deposition Ex. 1069]	ARCHER01998919	ARCHER01998937	FRE 105, R, FRE 403			
0395	HC-AEO	7/23/2013	Exclusive Patent License Agreement between The General Hospital Corporation and ArcherDX, Inc., MGH Agreement No.: A217008 [Myers Deposition Ex. 1070]	ARCHER01026246	ARCHER01026275	FRE 105, R, FRE 403			
0396	HC-AEO	3/22/2019	License Agreement by and between Becton, Dickinson and Company and ArcherDx, Inc. [Myers Deposition Ex. 1071]	ARCHER00093657	ARCHER00093678	FRE 105, R, FRE 403			
0397	HC-AEO	1/25/2021	Invitae presentation "Integrated 2021 Oncology Dev Plan" [Myers Deposition Ex. 1072]	ARCHER02001403	ARCHER02001438	FRE 105, R, FRE 403			
0398	HC-AEO	2/4/2021	Invitae presentation "DSR: Oncology" [Myers Deposition Ex. 1073]	ARCHER01998735	ARCHER01998746	FRE 105, R, FRE 403			
0399	HC-AEO	10/14/2020	Invitae presentation "Archer Integrations Phase II Kick Off" [Myers Deposition Ex. 1074]	ARCHER02001507	ARCHER02001536	FRE 105, R, FRE 403			
0400	HC-AEO	12/10/2020	Invitae Archer presentation "Eli Lilly Invitae Overview" [Myers Deposition Ex. 1075]	ARCHER01650187	ARCHER01650237	FRE 105, R, FRE 403			
0401		8/9/2021	United States Securities and Exchange Commission Form 10-Q Invitae Corporation for the quarterly period ended June 30, 2021 [Myers Deposition Ex. 1076]			FRE 105, R, FRE 403			
0402	HC-AEO	10/2/2020	KPMG presentation titled "Invitae Corporation Economic and Valuation services Valuation of acquired tangible and intangible assets of ArcherDx, Inc. [Myers Deposition Ex. 1077]	ARCHER00093219	ARCHER00093305	FRE 105, R, FRE 403, H			
0403	CONF	9/24/2020	Email from A. Rondot to Competitive Intelligence regarding "Medicare Issues Draft Local Coverage Determination for Signatera in Immunotherapy Response Monitoring" [Myers Deposition Ex. 1078]	ARCHER01141108	ARCHER01141108	FRE 105, R, FRE 403, H			
0404	HC-AEO	11/14/2019	Email from J. Myers to A. Flynn regarding "FW: food for thought..." [Myers Deposition Ex. 1079]	ARCHER01240694	ARCHER01240713	FRE 105, R, FRE 403, H			
0405		2/21/2019	District Court, Boulder County, Colorado Case No. 2019CV30142 ArcherDX, INC. v. Debra Giorda and Natera, Inc. Amended Verified Complaint for Injunctive Relief and Damages [Myers Deposition Ex. 1080]			FRE 105, R, FRE 403, BRPL, H			
0406		2/3/2021	Natera, Inc.'s Opening <i>Markman</i> Brief [Quackenbush Deposition Ex. 5]			BRPL, H, R, FRE 403			
0407		2/27/2017	Declaration of Professor John Quackenbush, Ph.D. C.A. No. 15-152-RGA, Raindance v. 10X Genomics [Quackenbush Deposition Ex. 6]			H, FN, MIL, FRE 403, R, H, BPRL, EXPERT			
0408		12/4/2019	United States Patent and Trademark Office, Before the Patent Trial and Appeal Board, Foundation Medicine, Inc., v. Gaurdant Health, Inc., Case IPR2019-00652 Patent No. 9,834,822 Declaration of Dr. John Quackenbush [Quackenbush Deposition Ex. 7]			FN, FRE 403, R, H, H, BPRL, EXPERT			
0409		2/27/2017	Declaration of Professor John Quackenbush, Ph.D.: Claim Construction Principles, C.A. No. 15-152-RGA, Raindance v. 10X Genomics [Quackenbush Deposition Ex. 8]			FN, FRE 403, R, H, H, BPRL, EXPERT			
0410		2/19/2020	Deposition Transcript of John Quackenbush, Ph.D. (Case No. IPR2019-00652 Patent 9,834,822) [Quackenbush Deposition Ex. 10]			FN, FRE 403, R, H, DEP, H			
0411		2/3/2021	Natera presentation titled: "Natera v. ArcherDX Natera's Technology Tutorial" [Quackenbush Deposition Ex. 11]			FN, FRE 403, R			
0412		3/29/2007	Warren A. Klibbe "OligoCalc: an online oligonucleotide properties calculator" <i>Nucleic Acids Research</i> , 2007 Vol. 35 [Quackenbush Deposition Ex. 13]			FRE 403, R, MIL, FN			
0413		11/14/2017	Alexander Vologodskii & Maxim D. Frank-Kamentskii "DNA melting and energetics of the double helix" <i>Physics of Life Reviews</i> 25, 1-21 [Quackenbush Deposition Ex. 14]			FRE 403, R, MIL, FN			
0414		6/3/2017	First Page of U.S. Patent No. 9,677,118 B2 (Zimmerman et al.) [Quackenbush Deposition Ex. 4]			FRE 403, R, MIL, FN, 28 U.S.C. § 1744, FRE 106, C, Q			

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
0415		3/24/2020	U.S. Patent No. 10,597,709 B2 (Zimmerman et al.) [Quackenbush Deposition Ex. 6]			FRE 403, R, MIL, FN, 28 U.S.C. § 1744			
0416	HC-AEO	11/20/2020	Expert Report of Raymond S. Sims Regarding the Commercial Success of U.S. Patent Nos. 10,017,810 and 10,450,597, Civil Action No. 18-1019-MN ArcherDx v Qiagen [Quackenbush Deposition Ex. 12]	ARCHER00110375	ARCHER00110419	FRE 403, R, MIL, FN, EXPERT, H			
0417	HC-AEO	7/9/2020	Archer LiquidPlex Protocol for Illumina [Quackenbush Deposition Ex. 14]	ARCHER00049774	ARCHER00049796	FRE 403, R, C			
0418		00/00/2021	AMPure XP for PCR Purification Cleanup and Size Selection [Quackenbush Deposition Ex. 15]			FRE 403, R, C			
0419	HC-AEO		Archer presentation titled "Personal. Actionable. Local." [Quackenbush Deposition Ex. 16]	ARCHER01301980	ARCHER01302160	FRE 403, R, C			
0420	HC-AEO		Archer presentation titled "Democratizing Precision Oncology" [Quackenbush Deposition Ex. 17]	ARCHER01292624	ARCHER01292687	FRE 403, R, C			
0421		11/4/2014	Enzymatics Product Requirements Document [Quackenbush Deposition Ex. 19]	ARCHER01082452	ARCHER01082457	FRE 403, R, C			
0422		00/00/2001	Molecular Cloning A Laboratory Manual Volume 1 Third Edition [Quackenbush Deposition Ex. 22]			FRE 403, R, C			
0423	HC-OAEO	11/25/2019	Deposition Transcript of Matthew Rabinowitz Ph.D. Case No: 3:18-cv-01662-SL, Illumina v. Natera (Rabinowitz Deposition Ex. 9)			MIL, DEP, FN, H, FRE 403, R			
0424		6/29/2021	Defendants' Second Notice of Deposition of Natera, Inc./ Pursuant to Federal Rule of Civil Procedure 30(b)(6) [Rabinowitz Deposition Ex. 13]			BRPL, H, R, FRE 403, C			
0425		10/27/2021	Third Amended Consolidated Complaint for Patent Infringement [Rabinowitz Deposition Ex. 14]			BRPL, H, R, FRE 403			
0426	HC-AEO	7/27/2016	Email from S. Moshkevich to B. Zimmerman, et al. re "60% recovery rate" [Rabinowitz Deposition Ex. 16]	NAT-AR-00301888	NAT-AR-00301891	H, FN, MIL, FRE 403, R			
0427		9/22/2016	Archer document titled "ArcherDx dives into liquid biopsy research with Reveal ctDNA 28 assay" [Rabinowitz Deposition Ex. 17]			FRE 403, R			
0428	HC-AEO	9/17/2021	Natera's Second Supplemental Responses and Objections to Defendants' Fifth set of Interrogatories [Nos. 18, 24, and 25] [Rabinowitz Deposition Ex. 18]			BRPL, H, R, FRE 403			
0429	HC-AEO	00/00/2016	Archer Training Agenda, Natera [Rabinowitz Deposition Ex. 21]	ARCHER00108366	ARCHER00108366	FN, FRE 403, R			
0430			LinkedIn Profile Allison Ryan [Ryan Deposition Ex. 1]			FRE 403, C, FRE1002-1003, R, MIL			
0431		00/00/2001	Vinay K. Singh et al. "PCR Primer Design" Molecular Biology Today, 27-32 [Ryan Deposition Ex. 4]			FN, FRE 403, R, MIL			
0432	HC-AEO		Document titled "Goals" [Ryan Deposition Ex. 5]	NAT-AR-00132301	NAT-AR-00132310	FN, FRE 403, R, MIL			
0433	HC-AEO	11/8/2010	Email from A. Ryan to G. Gemelos, Stymir Sigurjonsson & Melina Banjevic regarding "sequence data parsing utilities" [Ryan Deposition Ex. 6]	NAT-AR-00416708	NAT-AR-00416708	FRE 403, R, MIL, H			
0434	HC-AEO	12/9/2010	Email from A. Ryan to G. Gemelos, S. Sigurjonsson & M. Banjevic regarding "snp normalization function released into research" [Ryan Deposition Ex. 7]	NAT-AR-00570566	NAT-AR-00570566	FRE 403, R, MIL, H			
0435	HC-AEO	1/30/2011	Email from M. Banjevic to A. Ryan regarding "Re: data spec, another attempt" [Ryan Deposition Ex. 8]	NAT-AR-00335237	NAT-AR-00335240	FRE 403, R, MIL, H			
0436	HC-AEO		Data Graphs [Ryan Deposition Ex. 9]	NAT-AR-00330456	NAT-AR-00330456	FRE 403, R, MIL			
0437			Excel spreadsheet containing Ambry and Eureka bias data spreadsheet [Ryan Deposition Ex. 10]			FRE 403, R, MIL			
0438	HC-AEO	6/1/2011	Email from A. Ryan to M. Banjevic regarding "Inconsistency in sim results" [Ryan Deposition Ex. 11]	NAT-AR-00335206	NAT-AR-00335206	FRE 403, R, MIL			
0439			Excel spreadsheet containing Hit rate and confidence graphs and data [Ryan Deposition Ex. 12]			FRE 403, R, MIL			
0440	HC-AEO	8/24/2011	Email from G. Gemelos to M. Banjevic et al. regarding "Re: plasma info" [Ryan Deposition Ex. 13]	NAT-AR-00329926	NAT-AR-00329938	FRE 403, R, MIL, H			
0441	HC-AEO		Slide presentation titled "Consistent Bias Modeling: 53plex" [Ryan Deposition Ex. 14]	NAT-AR-00351459	NAT-AR00351462	FRE 403, R, MIL			
0442	HC-AEO	9/6/2011	Email from M. Dodd to A. Ryan et al. regarding "Blanked" (not masked) mapped data for all D5/D6 PCR data from aug 28 sequencing run available" [Ryan Deposition Ex. 15]	NAT-AR-00146080	NAT-AR-00146080	FRE 403, R, MIL, H			
0443	HC-AEO	12/8/2011	Email from A. Ryan to G. Gemelos regarding "NIPD counting method estimated timeline" [Ryan Deposition Ex. 16]	NAT-AR-00436664	NAT-AR-00436664	FRE 403, R, MIL, FN			
0444	HC-AEO	1/28/2016	M. Jamal-Hanjani et al "Detection of Ubiquitous and Heterogeneous Mutations in Cell-Free DNA from Patients with Early- Stage Non-Small-Cell Lung Cancer" M. Jamal-Hanjani et al. [Sakarya Deposition Ex. 1]	NAT-AR-00169444	NAT-AR-00169462	FRE 403, R, MIL, FN			
0445	HC-AEO	9/12/2014	Email from J. Babiarz to O. Sakarya et al. regarding "Re: Systematic Primer Dimer Detection" [Sakarya Deposition Ex. 3]	NAT-AR-00341086	NAT-AR-00341087	FRE 403, R, MIL, H			
0446	HC-AEO	4/11/2014	Email from B. Zimmermann to O. Sakarya regarding "Fwd: dimer math" [Sakarya Deposition Ex. 4]	NAT-AR-00341398	NAT-AR-00341400	FRE 403, R, MIL, H			
0447	HC-AEO	9/12/2014	Email from R. Salari to J. Babiarz et al. regarding "Re: Systematic Primer Dimer Detection" [Sakarya Deposition Ex. 5]	NAT-AR-00341077	NAT-AR-00341079	FRE 403, R, MIL, H			
0448	HC-AEO	1/21/2020	Natera presentation "Natera Signatera Workflow and PCR Schematics" [Spellman Deposition Ex. 10]	NAT-AR-00121392	NAT-AR-00121400	FRE 403, R, MIL, FN			
0449	HC-AEO	10/14/2015	M. Johnson "Natera Describes Massively Multiplexed PCR Technology, Liquid Biopsy Pipeline at ASHG" Genomeweb Article/www.genomeweb.com/pcr/natera-describes-massively-multiplexed-pcr-technology-liquid-biopsy-pipeline-ashg [Spellman Deposition Ex. 14]	NAT-AR-00191939	NAT-AR-00191941	FRE 403, R, FN			
0450		9/00/2000	S. Shigenobu et al. "Genome sequence of the endocellular bacterial symbiont of aphids Buchnera Sp APS" Nature Vol. 407 [Spellman Deposition Ex. 15]			FRE 403, R, FN			
0451		7/18/2009	I. Bronner et al "Improved Protocols for Illumina Sequencing" Curr Protoc Hum Genet. [Spellman Deposition Ex. 16]			FRE 403, R, FN			
0452		11/00/2010	Illumina document titled "TruSeq DNA Sample Preparation Guide" [Spellman Deposition Ex. 17]			FRE 403, R, FN			
0453		10/3/2011	Provisional Application for Patent, Attny Docket No: 118103-012100/PRO [Spellman Deposition Ex. 21]			FRE 403, R, FN			
0454			Claims Atty Docket No. N.012.US.20 [Spellman Deposition Ex. 27]			FRE 403, R, FN			
0455	HC-AEO	11/10/2020	Archer Presentation titled B518:C518"Personal Cancer Monitoring (PCM) Pricing ELT Review [Stahl Deposition Ex. 1136]	ARCHER01439264	ARCHER01439291	FRE 105, FRE 403, R			
0456	HC-AEO		Archer document titled "Product Plan, Personalized Cancer Monitoring (PCM)" [Stahl Deposition Ex. 1137]	ARCHER01531709	ARCHER01531799	FRE 105, FRE 403, R			
0457	HC-AEO	3/21/2019	Email from J. Stahl to P. Doshi et al. re "BMS/ArcherDX - Timelines for CLIA Validation & Personalized Panel Cost Estimate - additional details needed - CONFIDENTIAL" [Stahl Deposition Ex. 1138]	ARCHER01170227	ARCHER01170231	FRE 105, FRE 403, R			
0458	HC-AEO	5/27/2017	First Amendment to Exclusive Patent License Agreement A217008.04 by and between The General Hospital Corporation and ArcherDx [Stahl Deposition Ex. 1139]	ARCHER01844045	ARCHER01844048	FRE 105, FRE 403, R			
0459	HC-AEO	9/24/2020	IVD Test Kit Development Agreement between Illumina Inc. and ArcherDX, Inc. [Stahl Deposition Ex. 1140]	ARCHER01444717	ARCHER1444780	FRE 105, FRE 403, R			
0460	HC-AEO	12/16/2014	Supply and Manufacturing Agreement between Qiagen Inc. and ArcherDX, Inc. [Stahl Deposition Ex. 1141]	ARCHER01049515	ARCHER01049535	FRE 105, FRE 403, R			
0461	HC-AEO	12/16/2014	Amendment No. 1 to Supply Agreement between Qiagen Inc. and ArcherDX Inc. [Stahl Deposition Ex. 1142]	ARCHER01061775	ARCHER01061778	FRE 105, FRE 403, R			
0462	HC-AEO	00/00/2016	Archer Presentation "Overview of Qiagen Issues" [Stahl Deposition Ex. 1143]	ARCHER02360542	ARCHER02360548	FRE 105, FRE 403, R			
0463	HC-AEO	10/11/2019	Technology License and Technical Assistance Agreement between Genosity Inc. and ArcherDX, Inc. [Stahl Deposition Ex. 1144]	ARCHER00092211	ARCHER00092230	FRE 105, FRE 403, R			
0464		10/22/2019	U.S. Patent No. 10,450,597 B2 (Iafraite et al.) [Stahl Deposition Ex. 1145]	ARCHER00052100	ARCHER00052147	FRE 105, FRE 403, R			
0465		1/26/2015	Information Disclosure Statement by Application Number 14605363 [Stahl Deposition Ex. 1146]			FRE 105, FRE 403, R			
0466	HC-AEO	1/21/2016	Email from I. Zlatkovsky to J. Stahl re "Re: Natera quote and purchase" [Stahl Deposition Ex. 1148]	ARCHER01278144	ARCHER01278145	FRE 105, FRE 403, R			
0467	HC-AEO	1/26/2021 - 1/28/2021	Invitae Presentation "PCM Intensive" [Stahl Deposition Ex. 1149]	ARCHER01457308	ARCHER01457338	FRE 105, FRE 403, R			
0468		1/9/2020	Stipulation of Dismissal with Prejudice of all Claims Between ArcherDx and Debra Giorda [Stahl Deposition Ex. 1160]			FRE 105, FRE 403, R			
0469		3/6/2020	Notice of Dismissal Without Prejudice [Stahl Deposition Ex. 1161]			FRE 105, FRE 403, R			

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
0470		5/18/2021	Plaintiff Natera, Inc.'s Notice of Deposition of Defendants Pursuant to Fed. R. Civ. P. 30(b)(6) [Stefanelli Deposition Ex. 1041]			BRPL, H. R., FRE 403, C			
0471	HC-AEO	8/6/2019	Archer document "Statement of Work: 1 AstraZeneca Minimal Disease (MRD) IDE Project Work Plan" [Stefanelli Deposition Ex. 1043]	ARCHER01577494	ARCHER01577506	FRE 105, FRE 403, R			
0472		6/3/2021	Invitae press release "Invitae opens early access to liquid biopsy-based Personalized Cancer Monitoring as a central laboratory service" http://www.pnnewsire.com/news-releases/invitae-opens-early-access-to-liquid-biopsy-based-personalized-cancer-monitoring-as-a-central-laboratory-service-301304799.html [Stefanelli Deposition Ex. 1045]			FRE 105, FRE 403, R			
0473			Archer Deal Tracker Spreadsheet and Comments [Stefanelli Deposition Ex. 1046]			FRE 105, FRE 403, R			
0474	HC-AEO	11/3/2020	Email from Candice Hoenes to Brian Wright et al. regarding "Re: Genentech follow up" [Stefanelli Deposition Ex. 1047]	ARCHER0145671	ARCHER0145674	FRE 105, FRE 403, R, H			
0475	HC-AEO	3/00/2021	Invitae document titled "PMC Competitive Landscape Analysis Write-up" [Stefanelli Deposition Ex. 1048]	ARCHER02008654	ARCHER02008662	FRE 105, FRE 403, R			
0476	HC-AEO	1/4/2021	Invitae presentation titled "Pharma Summit #1" [Stefanelli Deposition Ex. 1049]	ARCHER01998861	ARCHER01998911	FRE 105, FRE 403, R			
0477		00/00/2020	FY20 Summary Spreadsheet [Stefanelli Deposition Ex. 1050]			FRE 105, FRE 403, R			
0478		10/20/2011	United States Patent and Trademark Office Receipt for U.S. Patent Application 61/542508 [Stoll Deposition Ex. 3]			FRE 105, FRE 403, R, 28 U.S.C. § 1744, Q, MIL			
0479		7/10/2018	U.S. Patent No. 10,017,812 B2 (Rabinowitz et al.) [Stoll Deposition Ex. 4]			FRE 105, FRE 403, R, 28 U.S.C. § 1744, MIL			
0480		12/10/2021	Document List for Application 16/360,843 Methods for Non-Invasive Prenatal Policy Calling [Stoll Deposition Ex. 6]			FRE 105, FRE 403, R, 28 U.S.C. § 1744, Q, MIL			
0481		12/18/2013	U.S. International Trade Commission, In the Matter of: Certain Wireless Devices with 3G and/or 4G Capabilities and Components Thereof, Inv. 337-TA-868, Order No. 84: Granting Complainant Interdigitals Motion to Strike Expert Report of Robert L. Stoll [Stoll Deposition Ex. 7]			BRPL, H. R., FRE 403, MIL			
0482		5/10/2011	U.S. Patent No. 7,941,151 B2 (Rudolf et al.) [Stoll Deposition Ex. 8]			FRE 105, FRE 403, R, 28 U.S.C. § 1744, MIL			
0483		5/25/2021	Precision Oncology News Press Release "F-Star Therapeutics to Use Invitae's RaDaR Assay in Clinical Studies" [Sullivan Deposition Ex. 4]			FRE 403, R, FN			
0484	HC-AEO	6/18/2018	Archer document titled "Archer FusionPlex Protocol for Illumina" [Tilison Deposition Ex. 1026]	ARCHER00049797	ARCHER00049820	FRE 403, R, FN, C, FRE 105			
0485	HC-AEO	2/8/2018	Archer document titled "Archer FusionPlex Protocol for Ion Torrent" [Tilison Deposition Ex. 1027]	ARCHER01984408	ARCHER01984429	FRE 403, R, FN, C, FRE 105			
0486	HC-AEO	11/12/2019	Archer document titled "Archer LiquidPlex Protocol for Illumina" [Tilison Deposition Ex. 1028]	ARCHER01526461	ARCHER01526480	FRE 403, R, FN, C, FRE 105			
0487	HC-AEO	00/00/2020	Archer document titled "LiquidPlex ctDNA 28" [Tilison Deposition Ex. 1029]	ARCHER02231124	ARCHER02231126	FRE 403, R, FN, C, FRE 105			
0488	HC-AEO	2/21/2020	Archer document titled "Stratafide ctDNA Instructions for Use" [Tilison Deposition Ex. 1030]	ARCHER00027781	ARCHER00027810	FRE 403, R, FN, C, FRE 105			
0489	HC-AEO	4/14/2020	Archer presentation "Archer MET Assay System for RNA and ctDNA" Mike Khan [Tilison Deposition Ex. 1031]	ARCHER01286571	ARCHER01286599	FRE 403, R, FN, C, FRE 105			
0490	HC-AEO	1/13/2020	Archer document titled "MRD Assay for ctDNA Instructions for Use" [Tilison Deposition Ex. 1032]	ARCHER00027582	ARCHER00027609	FRE 403, R, FN, C, FRE 105			
0491	HC-AEO	4/14/2020	Email from M. Chapman to A. Soufan & D. Fugere regarding "FW: Product Training - ArcherMET" [Tilison Deposition Ex. 1033]	ARCHER01286569	ARCHER01286570	FRE 403, R, FN, C, FRE 105, H			
0492	HC-AEO		Archer presentation titled "ArcherDx Technical Training Stratafide ctDNA" [Tilison Deposition Ex. 1034]	ARCHER01998405	ARCHER01998457	FRE 403, R, FN, C, FRE 105			
0493	HC-AEO	4/16/2020	Archer presentation "ArcherDx Technical Training Stratafide ctDNA" Annouck Luyten [Tilison Deposition Ex. 1035]	ARCHER01935850	ARCHER01935902	FRE 403, R, FN, C, FRE 105			
0494	HC-AEO	5/14/2020	Email from Darius Fugere to Holly Tilison et al. regarding "Re: Interpace VP-CTL Training Summary" [Tilison Deposition Ex. 1036]	ARCHER02103723	ARCHER02103724	FRE 403, R, FN, C, FRE 105, H			
0495	HC-AEO	5/18/2020	Email from B. Wright to H. Tilison & T. Druley regarding "Re: ION-STRATAFIDE Day 1 Laboratory? (Assistance for Invitae)" [Tilison Deposition Ex. 1037]	ARCHER01979430	ARCHER01979431	FRE 403, R, FN, C, FRE 105, H			
0496	HC-AEO	4/29/2015	Email from J. Bon to Training Summary regarding "Medical College of WI Training Summary" [Tilison Deposition Ex. 1038]	ARCHER02097628	ARCHER02097629	FRE 403, R, FN, C, FRE 105, H			
0497	HC-AEO	4/30/2020	Archer document titled "FAS Training Summary" [Tilison Deposition Ex. 1039]	ARCHER02102671	ARCHER02102677	FRE 403, R, FN, C, FRE 105			
0498	HC-AEO	2/26/2020	Email from M. Rodenbaugh to Y. Konigshofer & H. Tilison regarding "Custom LiquidPlex Panel" [Tilison Deposition Ex. 1040]	SeraCare.001	SeraCare.001	FRE 403, R, FN, C, FRE 105, H			
0499	HC-AEO	00/00/2019	Archer document titled "MRD Assay for ctDNA Instructions for Use" [Walters Deposition Ex. 1118]	ARCHER00027364	ARCHER00027381	FRE 403, R, FN, C, FRE 105			
0500	HC-AEO		Archer document titled "MRD Assay for ctDNA" [Walters Deposition Ex. 1119]	ARCHER00036294	ARCHER00036328	FRE 403, R, FN, C, FRE 105			
0501			Sequence Data Spreadsheet [Walters Deposition Ex. 1120]			FRE 403, R, FN, C, FRE 105			
0502	HC-AEO		Native Document with Primer Data [Walters Deposition Ex. 1121]	ARCHER00074567	ARCHER00074567	FRE 403, R, FN, C, FRE 105			
0503	HC-AEO		Document in Native Format Containing Code [Walters Deposition Ex. 1122]	ARCHER00095811	ARCHER00095811	FRE 403, R, FN, C, FRE 105			
0504	HC-AEO	00/00/2020	Archer document titled "Premarketing Application ArcherDX STRATAFIDE Dx Tempotinib Cdx Module 1: Design Control and Manufacturing" [Walters Deposition Ex. 1123]	ARCHER00044976	ARCHER00045056	FRE 403, R, FN, C, FRE 105			
0505	HC-AEO	00/00/2019	Archer document titled "STRATAFIDE RNA Instructions for Use" [Walters Deposition Ex. 1124]	ARCHER00027610	ARCHER00027643	FRE 403, R, FN, C, FRE 105			
0506	HC-AEO	2/21/2020	Archer document titled "STRATAFIDE DNA Instructions for Use" [Walters Deposition Ex. 1125]	ARCHER00027550	ARCHER00027581	FRE 403, R, FN, C, FRE 105			
0507	HC-AEO	8/28/2019	Archer document titled "Attachment 1 Initial IFU for METvar ctDNA Test Kit" [Walters Deposition Ex. 1126]	ARCHER00044913	ARCHER00044938	FRE 403, R, FN, C, FRE 105			
0508	HC-AEO	00/00/2019	Archer document titled "Appendix 2 Initial IFU for METvar RNA Test Kit" [Walters Deposition Ex. 1127]	ARCHER00044879	ARCHER00044907	FRE 403, R, FN, C, FRE 105			
0509	HC-AEO	2/24/2020	Archer document titled "MET AMP Test on the RevealDX Assay for ctDNA Instructions for Use" [Walters Deposition Ex. 1128]	ARCHER00027341	ARCHER00027363	FRE 403, R, FN, C, FRE 105			
0510	HC-AEO	1/16/2020	Archer document titled "NOTCH for DNA Instructions for Use" [Walters Deposition Ex. 1132]	ARCHER00050451	ARCHER00050484	FRE 403, R, FN, C, FRE 105			
0511	HC-AEO	2/6/2020	Archer document titled "NOTCH for RNA Instructions for Use" [Walters Deposition Ex. 1133]	ARCHER00050339	ARCHER00050373	FRE 403, R, FN, C, FRE 105			
0512			Spreadsheet with DNA Sequence Data [Walters Deposition Ex. 1134]			R, FRE 403, FN			
0513	HC-AEO	11/19/2020	Document titled "Research and Development Version 01 by R. Walters" [Walters Deposition Ex. 1135]	ARCHER02002311	ARCHER02002313	A, R, FRE 403, FN, H			
0514	HC-AEO		Business Organization Chart [White Depositions Ex. 1162]	ARCHER01534874		A, R, FRE 403			
0515	HC-AEO		Archer document titled "Stratafide DNA Instructions for Use" [White Depositions Ex. 1163]	ARCHER01711407	ARCHER01711436	A, R, C, FRE 403, FN, H			
0516	HC-AEO	00/00/2019	Archer document titled "VariantPlex Custom HS/HGC Panel Product Insert, VariantPlex BMS Core Myeloid" [White Depositions Ex. 1164]	ARCHER00133308	ARCHER00133310	A, R, C, FRE 403, FN, H			
0517	HC-AEO	4/3/2020	Email from V. Johnson to M. White et al. regarding "VariantPlex OncoCLinicas Solid Tumor V2 Draft CS and QC Report (Bulk Material)" [White Depositions Ex. 1165]	ARCHER01413928	ARCHER01413928	A, R, C, FRE 403, FN, H			
0518	HC-AEO	3/27/2020	Archer document titled "QC Report, Gene-Specific Primers, Report Number QCR2020030331.4 [White Depositions Ex. 1166]	ARCHER01413953	ARCHER01413961	A, R, C, FRE 403, FN, H			
0519			Google Patents 35 U.S. Code Section 271 - Infringement of patent [Wojcik Deposition Ex. 4]			A, R			
0520	HC-AEO	12/14/2018	Invitae, Standard Operating Procedure, Document Number SOP0004, Rev 6, Design Control [Wojcik Deposition Ex. 6]	ARCHER00122038	ARCHER00122047	A, R, FRE 403, FN, H			
0521	HC-AEO		Archer, Design and Development Plan, ADX-M002, Plan Number PLN0045, Rev 3 [Wojcik Deposition Ex. 7]	ARCHER01708916	ARCHER01708941	A, R, C, FRE 403, FN, H			
0522		2/16/2017	Companion Diagnostic Initiation Agreement between Celgene Corporation and ArcherDx, Inc. relating to Companion Diagnostics development [Wojcik Deposition Ex. 8]			A, R, FRE 403, FN, H			
0523	HC-AEO	12/1/2020	Invitae presentation titled "ArcherDx/Invitae Milestones STRATAFIDE and PCM" [Wojcik Deposition Ex. 9]	ARCHER01421073	ARCHER01421090	A, R, FRE 403, FN, H			
0524		3/27/2020	Initiation Agreement Between Bristol-Myers Company and ArcherDx [Wojcik Deposition Ex. 11]			A, R, FRE 403, FN, H			

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
0525			LinkedIn Profile Alexander Wong [Wong Deposition Ex. 1]			A. R. H. FRE 403, MIL			
0526	HC-AEO	3/28/2014	Natera presentation titled "Haplotyping Assays" by Alex Wong [Wong Deposition Ex. 4]	NAT-AR-00146727	NAT-AR-00146742	A. R. FRE 403			
0527	HC-AEO	5/30/2013	Slide presentation titled "NGCS Design Overview" by Alex Wong [Wong Deposition Ex. 5]	NAT-AR-00325819	NAT-AR-00325835	A. R. FRE 403			
0528	HC-AEO	7/29/2013	Email from A. Wong to D. Best regarding "primer-dimer papers" [Wong Deposition Ex. 7]	NAT-AR-00325730	NAT-AR-00325730	A. R. H. FRE 403			
0529		8/19/2021	Norman E Watkins Jr et al. Abstract of "Thermodynamic contributions of single internal rA · dA, rC · dC, rC · dC · rG · dG and rU · dT mismatches in RNA/DNA duplexes" Nucleic Acids Research, 2011, Vol.39, No.5 https://pubmed.ncbi.nlm.nih.gov/21071398/ [Wong Deposition Ex. 8]			A. R. FRE 403, NR, FN, H			
0530		9/22/2010	Norman E Watkins Jr et al. "Thermodynamic contributions of single internal rA · dA, rC · dC, rC · dC · rG · dG and rU · dT mismatches in RNA/DNA duplexes". Nucleic Acids Research, 2011, Vol.39, No.5 [Wong Deposition Ex. 9]			A. R. FRE 403, NR, FN, H			
0531		5/10/2021	Defendants' Notice of Deposition of Natera, Inc. Pursuant to Federal Rule of Civil Procedure 30(b)(6) [Zimmermann Deposition Ex. 1]			BRPL, H. R. FRE 403, C			
0532		6/26/2021	Defendants' Second Notice of Deposition of Natera, Inc. Pursuant to Federal Rule of Civil Procedure 30(b)(6) [Zimmermann Deposition Ex. 2]			BRPL, H. R. FRE 403, C			
0533		6/29/2018	Declaration of Michael L. Metzker, Ph.D. Case No. IPR2018-01317 [Zimmermann Deposition Ex. 10]			R. FRE 403 BRPL, EXPERT			
0534	HC-AEO		Archer document titled "Archer Pre-Site Checklist Natera" [Zimmermann Deposition Ex. 25]	ARCHER00108208	ARCHER00108210	A. R. FRE 403, H, FN			
0535	HC-AEO	3/22/2016	Email from B. Hoang to C. Pierson regarding Library quantification [Zimmermann Deposition Ex. 27]	ARCHER00108540	ARCHER00108540	A. R. FRE 403, H, FN			
0536	HC-AEO	8/14/2019	Archer, Appendix 24, Case Report Form (Data Collection Form) for METvar RNA Test Kit	ARCHER000041584	ARCHER000041588	A. R. C. FRE 403, FN			
0537	HC-AEO	8/28/2019	Archer, Appendix 25, Case Report Form (Data Collection Form) for METvar RNA Test Kit	ARCHER000041589	ARCHER000041630	A. R. C. FRE 403, FN			
0538	HC-AEO	9/4/2019	Acknowledgement letter from Center for Devices and Radiological Health to H. Froman	ARCHER000041631	ARCHER000041631	A. R. FRE 403, FN			
0539	HC-AEO	9/19/2019	Archer, Appendix 23, Diagnostic Protocol	ARCHER000041632	ARCHER000041665	A. R. FRE 403, FN			
0540	HC-AEO	8/30/2019	Letter from H. Froman to R. Philip regarding Re: Original IDE Application for the ArcherDX MET Variant Test on the RevealDX Assay System	ARCHER00041666	ARCHER00041666	A. R. C. FRE 403, H, FN			
0541	HC-AEO	2/19/2020	Letter from H. Froman to R. Philip regarding Re: G190227 IDE 5-Day Notice for the ArcherDX MET Variant Test on the RevealDX Assay System	ARCHER00042128	ARCHER00042129	A. R. C. FRE 403, H, FN			
0542	HC-AEO		Archer, Original Investigational Device Exemption Application, ArcherDX MET Variant Test On The RevealDX Assay	ARCHER00042130	ARCHER00042238	A. R. FRE 403, H, FN			
0543	HC-AEO	10/3/2019	Letter from R. Philip to H. Froman regarding Re: G190227 Trade/Device Name: ArcherDX MET Variant Test on the RevealDX Assay System	ARCHER00042360	ARCHER00042365	A. R. C. FRE 403, H, FN			
0544	HC-AEO	00/00/2019	Archer, Appendix 30, IFU for METvar RNA Test Kit	ARCHER00042606	ARCHER00042634	A. R. C. FRE 403, FN			
0545	HC-AEO	8/28/2019	Archer, Appendix 31, IFU METvar cDNA Test Kit	ARCHER00042635	ARCHER00042660	A. R. C. FRE 403, FN			
0546	HC-AEO	10/15/2018	Archer RevealDX Assay System Pre-Submission Documents	ARCHER00042746	ARCHER00043054	A. R. 403, M, C, FN			
0547	HC-AEO		Archer, Orthogonal Methods for Analytical Accuracy, Q181970 Supplement, Archer RevealDX Assay System	ARCHER00043178	ARCHER00043188	A. R. C. FRE 403, FN			
0548	HC-AEO		Archer, Real Time Stability Validation, Archer RevealDX Assay System	ARCHER00043327	ARCHER00043342	A. R. C. FRE 403, FN			
0549	HC-AEO	3/27/2019	Letter from T. Holwick to R. Philip regarding Re: Request for Pre-Submission Meeting regarding the Archer RevealDX Assay System	ARCHER00043408	ARCHER00043408	A. R. FRE 403, C, H			
0550	HC-AEO	11/21/2018	Letter from A. Northcutt to R. Philip regarding Re: Request for Breakthrough Device Designation	ARCHER00043796	ARCHER00043796	A. R. FRE 403, C, H			
0551	HC-AEO	10/10/2019	Letter from E. Burns to R. Philip regarding Re: Request for Breakthrough Designation	ARCHER00043924	ARCHER00043924	A. R. FRE 403, C, H			
0552	HC-AEO	10/18/2019	Letter from E. Burn to R. Philip regarding Re: Pre-Submission Meeting Request	ARCHER00044263	ARCHER00044263	A. R. FRE 403, C, H			
0553	HC-AEO	4/18/2019	Letter from S. Close to R. Philip regarding Re: Request for Study Risk Determination for Study MS200095-031	ARCHER00044388	ARCHER00044388	A. R. FRE 403, C, H			
0554	HC-AEO		Archer, G190227, IDE5-Day Notice, In-Process Controls and Kit Configuration, ArcherDX MET Variant Test on the RevealDX Assay	ARCHER00044689	ARCHER00044714	A. R. C. FRE 403, FN			
0555	HC-AEO		Archer, Premarketing Application, (M200014), ArcherDX STRATAFIDE Dx™ Tepotinib CDx, Module 2: Software	ARCHER00045495	ARCHER00045614	A. R. C. FRE 403, FN			
0556	HC-AEO	10/15/2018	Letter from T. Holwick to R. Philip regarding Re: Request for Pre-Submission Meeting Regarding MET Ex14 Test on the Archer RevealDX Assay System	ARCHER00047078	ARCHER00047078	A. R. FRE 403, C, H			
0557	HC-AEO	1/30/2020	Letter from T. Holwick to R. Philip regarding Re: Pre-Submission Meeting Request for Archer STRATAFIDE NTRK CDx	ARCHER00047455	ARCHER00047455	A. R. FRE 403, C, H			
0558	HC-AEO		Archer, G190227, IDE Annual Progress Report, ArcherDX MET Variant Test on the RevealDX Assay	ARCHER00059136	ARCHER00059146	A. R. C. FRE 403, FN			
0559	HC-AEO		Archer, Premarketing Application, M200014, ArcherDX STRATAFIDE Dx™, Module 3: Analytical Validation and Nonclinical Validation	ARCHER00062360	ARCHER00062702	A. R. C. FRE 403, FN			
0560	HC-AEO	4/22/2020	Project Schedule No. 1 Master Collaboration Agreement between ArcherDx and AstraZeneca UK Ltd	ARCHER00092261	ARCHER00092293	A. R. FRE 403, FN			
0561	HC-AEO	4/27/2020	Archer, Protocol: STRATAFIDE cDNA Verification and Validation Study: Reproducibility and Repeatability, Protocol Number: DHF17-A-4-1, Revision: 0	ARCHER00115588	ARCHER00115600	A. R. C. FRE 403, FN			
0562	HC-AEO	7/9/2020	Archer, Protocol: STRATAFIDE RNA Verification and Validation Study: Reproducibility and Repeatability: NTRK1, NTRK2, and NTRK3 RNA Fusion Detection, Protocol Number: DHF17-A-4-5, Revision: 0	ARCHER00115601	ARCHER00115616	A. R. C. FRE 403, FN			
0563	HC-AEO	4/24/2020	Archer, Protocol: STRATAFIDE RNA Verification and Validation Study: Reproducibility and Repeatability, Protocol Number: DHF17-A-4-17, Revision: 0	ARCHER00115617	ARCHER00115629	A. R. C. FRE 403, FN			
0564	HC-AEO	1/11/2021	Archer, Protocol: STRATAFIDE DNA Verification and Validation Study: Precision, Reproducibility and Repeatability, Protocol Number: DHF17-A-4-31, Revision: 1	ARCHER00115630	ARCHER00115645	A. R. C. FRE 403, FN			
0565	HC-AEO	11/11/2020	Archer, Protocol: STRATAFIDE RNA Verification and Validation Study: Reproducibility and Repeatability Confirmation for NTRK Fusions and METex14 skip RNA Variants, Protocol Number: DHF17-A-4-59, Revision: 0	ARCHER00115646	ARCHER00115661	A. R. C. FRE 403, FN			
0566	HC-AEO	9/6/2019	Archer, Protocol: Analytical Performance Study of Reproducibility of the Archer RevealDX MET Variant Test Using Cell Free DNA Input, Protocol Number: P2809182, Revision: 0	ARCHER00115662	ARCHER00115673	A. R. C. FRE 403, FN			
0567	HC-AEO	12/22/2020	Archer, Protocol, Clinical utility and analytical accuracy of the ArcherDX STRATAFIDE Assay to detect NTRK1, NTRK2, NTRK3 fusions in RNA from solid tumors for selection of patients who may be suitable for treatment with Larotrectinib	ARCHER00115674	ARCHER00115704	A. R. C. FRE 403, FN			
0568	HC-AEO		Archer, Premarket Approval Application, (M200016), ArcherDX Stratified Dx™, Module 1 - Introduction, Design Control, and Manufacturing	ARCHER00115707	ARCHER00115793	A. R. C. FRE 403, FN			
0569	HC-AEO		Archer, Premarketing Application, (M200016), ArcherDX Stratified Dx™, Module 2: Software	ARCHER00116285	ARCHER00116401	A. R. C. FRE 403, FN			
0570	HC-AEO		Archer, Premarket Approval Application, (M200016), ArcherDX Stratified Dx™, Module 3: Analytical Validation and Non-Clinical Studies	ARCHER00117758	ARCHER00118041	A. R. C. FRE 403, FN			
0571	HC-AEO	3/31/2020	Archer, Document Number DHF17-A-1-15, Rev 1, ADX-S001 Regulatory Plan	ARCHER00121906	ARCHER00121926	A. R. C. FRE 403, FN			
0572	HC-AEO	8/8/2018	Archer, Design and Development Plan, ArcherDX DLBC Assay, Plan Number: P0604181, Version B	ARCHER00121927	ARCHER00121941	A. R. C. FRE 403, FN			
0573	HC-AEO		Stratified RNA: Verification and Validation Plan, Document Number PLN0058, Rev 4	ARCHER00121942	ARCHER00122011	A. R. C. FRE 403, FN			
0574	HC-AEO		Archer, Design History Document, Document Number PLN0064, Rev 7, STRATAFIDE Dx™ Design and Development Plan	ARCHER00122012	ARCHER00122026	A. R. C. FRE 403, FN			
0575	HC-AEO		Archer, ADX-M002 Assay Verification and Validation Plan, Document Number PLN0213, Rev 0,	ARCHER00122027	ARCHER00122037	A. R. C. FRE 403, FN			
0576	HC-AEO	3/27/2020	Statement of Work between Bristol-Myers Squibb Company and ArcherDX, Inc., CA209-816	ARCHER00130169	ARCHER00130178	A. R. FRE 403			
0577	HC-AEO	3/27/2020	Statement of Work between Bristol-Myers Squibb Company and ArcherDX, Inc., CA209-815	ARCHER00130179	ARCHER00130188	A. R. FRE 403			

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
0578	HC-AEO		PCM Regulatory Strategy: one product development platform multiple applications	ARCHER01135515	ARCHER01135515	A. R. FRE 403			
0579	HC-AEO	5/7/2020	Archer, Standard Operating Procedure, Document Number S40, Rev 1, Control of Changes	ARCHER01139272	ARCHER01139279	A. R. 403, C			
0580	HC-AEO	00/00/2018	Archer, ArcherDX DLBCL Assay Product Insert, ArcherDX DLBCL Assay Kit, Part # SK0136	ARCHER01172623	ARCHER01172647	A. R. C, FRE 403, FN			
0581	HC-AEO	6/20/2016	Mutual Nondisclosure Agreement between Gritstone Oncology, Inc. and ArcherDX, Inc.	ARCHER01355351	ARCHER01355355	A. R. FRE 403			
0582	HC-AEO	1/28/2021	Invitae CDx Capabilities Presentation	ARCHER01452996	ARCHER01453030	A. R. FRE 403			
0583	HC-AEO	12/11/2020	Archer, Gritstone Oncology, SOW #1, Invitae-ArcherDX PCM Feasibility Study	ARCHER01454237	ARCHER01454279	A. R. FRE 403			
0584	HC-AEO	12/17/2020	Archer, Meeting Recap Notes, ArcherDX/Invitae and Merck USA	ARCHER01560113	ARCHER01560115	A. R. FRE 403			
0585	HC-AEO	4/30/2020	Archer, Design and Development Plan, Archer-MRD-M002, Plan Number: DHF15-A-1-2, DHF Number: DHF15, Revision: Version 0	ARCHER01585019	ARCHER01585042	A. R. C, FRE 403, FN			
0586	HC-AEO		Archer, Design and Development Plan, Archer-MRD-M002, Plan Number: DHF15-A-1-2, DHF Number: DHF15, Revision: 1	ARCHER01697837	ARCHER01697864	A. R. C, FRE 403, FN			
0587	HC-AEO		Archer, Design and Development Plan, Archer-MRD-M002 for MERMAID-1 and MERMAID-2 Clinical Trials, Plan Number: DHF15-A-1-2, DHF Number: DHF15, Revision: 2	ARCHER01697891	ARCHER01697915	A. R. C, FRE 403, FN			
0588	HC-AEO		Archer, Protocol: Acute Myeloid Leukemia Measurable Residual Disease for DNA Feasibility Study: Limit of Detection, Protocol Number: PTC0354	ARCHER01702880	ARCHER01702888	A. R. C, FRE 403, FN			
0589	HC-AEO		Archer, Protocol: Acute Myeloid Leukemia Measurable Residual Disease for DNA Feasibility Study: Sequencing Depth Requirement, Protocol Number: PTC0356	ARCHER01702889	ARCHER01702897	A. R. C, FRE 403, FN			
0590	HC-AEO		Archer, G190227/S005 Supplemental IDE, Screening and Enrollment Update, ArcherDX MET Variant Test on the RevealDX Assay	ARCHER02042713	ARCHER02042722	A. R. C, FRE 403, FN			
0591	HC-AEO		Archer, ArcherDX Stratified Dx™ - Completed Premarketing Application M200014-M004, Module 4: Clinical Studies, Labeling, Post-Marketing Plan, and Other Information	ARCHER02065643	ARCHER02065835	A. R. C, FRE 403, FN			
0592	HC-AEO		Archer, Protocol, Archer™ FusionPlex™ FGFR Kit for Illumina, PR-SK0030-ILMN Rev A	ARCHER02165754	ARCHER02165772	A. R. C, FRE 403, FN			
0593	HC-AEO	6/18/2020	Archer, PCM Non-Registration Retrospective Testing Qualification Form	ARCHER02177435	ARCHER02177435	A. R. FRE 403, FN			
0594	HC-AEO		Archer, Pre-Submission Meeting Request: Pre-IDE Considerations, Archer MRD Assay (For Investigational Use)	ARCHER02345892	ARCHER02345933	A. R. FRE 403, C			
0595		1/4/2018	Breakthrough Therapy, https://www.fda.gov/patients/fast-track-breakthrough-therapy-accelerated-approval-priority-review/breakthrough-therapy			A. R. FRE 403, U, H, FN			
0596		7/28/2014	The 510(k) Program: Evaluating Substantial Equivalence in Premarket Notifications [510(k)]. Guidance for Industry and Food and Drug Administration Staff			A. R. FRE 403, U, H, FN			
0597		4/19/2001	Guidance on Medical Device Patient Labeling; Final Guidance for Industry and FDA Reviewers, https://www.fda.gov/media/110689/download			A. R. FRE 403, U, H, FN			
0598		11/25/2013	Distribution of In Vitro Diagnostic Products Labeled for Research Use Only or Investigational Use Only, Guidance for Industry and FDA Staff, https://www.fda.gov/media/87374/download			A. R. FRE 403, U, H, FN			
0599		8/6/2014	In Vitro Companion Diagnostic Devices: Guidance for Industry and Food and Drug Administration Staff, https://www.fda.gov/regulatory-information/search-fda-guidance-documents/in-vitro-companion-diagnostic-devices			A. R. FRE 403, U, H, FN			
0600		10/3/2014	Draft Guidance for Industry, Food and Drug Administration Staff, and Clinical Laboratories, FDA Notification and Medical Device Reporting for Laboratory Developed Tests (LDTs), https://www.fda.gov/media/89837/download			A. R. FRE 403, U, H, FN			
0601		12/18/2018	Breakthrough Devices Program, Guidance for Industry and Food and Drug Administration Staff, https://www.fda.gov/media/108135/download			A. R. FRE 403, U, H, FN			
0602		4/00/2020	Developing and Labeling In Vitro Companion Diagnostic Devices for a Specific Group of Oncology Therapeutic Products, https://www.fda.gov/media/120340/download			A. R. FRE 403, U, H, FN			
0603		1/6/2021	Requests for Feedback and Meetings for Medical Device Submissions: The Q-Submission Program, Guidance for Industry and Food and Drug Administration Staff, https://www.fda.gov/media/114034/download			A. R. FRE 403, U, H, FN			
0604			Overview of IVD Regulation - FDA, https://www.fda.gov/medical-devices/ivd-regulatory-assistance/overview-ivd-regulation			A. R. FRE 403, U, H, FN			
0605			Search Databases, https://www.fda.gov/industry/fda-basics-industry/search-databases			A. R. FRE 403, U, H, FN			
0606			CMS, What Do I Need to Do to Assess Personnel Competency?, https://www.cms.gov/regulations-and-guidance/legislation/cia/downloads/cia_compbrochure_508.pdf			A. R. FRE 403, U, H, FN			
0607			Real-World Evidence, Real-world data (RWD) and real-world evidence (RWE) are playing an increasing role in health care decisions, https://www.fda.gov/science-research/science-and-research-special-topics/real-world-evidence			A. R. FRE 403, U, H, FN			
0608		11/12/2020	Get AMPed - Tweet, https://twitter.com/archerdxinc/status/1327002482007007232/photo/1			A. R. FRE 403, U, H, FN			
0609			Redline of '523 Application relative to the '508 Application			A. R. FRE 403, U, H, FN			
0610		9/15/2005	Marcel Margulies et al. "Genome sequencing in microfabricated high-density picolitre reactors" Nature Vol 437			A. R. FRE 403, U, H, FN			
0611		9/9/2005	Jay Shendure et al. "Accurate Multiplex Polony Sequencing of an Evolved Bacterial Genome" SCIENCE, Vol 309			A. R. FRE 403, U, H, FN			
0612	HC-AEO	7/12/2021	Natera's Final Infringement Contentions Ex. 4 - Preliminary Infringement Claim Chart for Archer's Accused products and the '220 Patent			R. BRPL, H, FRE 403			
0613	HC-AEO	7/12/2021	Natera's Final Infringement Contentions Ex. 5 - Final Infringement Claim Chart for Archer's Accused products and the '708 Patent			R. BRPL, H, FRE 403			
0614		7/9/2020	[D1027] Opposition to Defendant's Motion for Judgment on the Pleadings Under Fed. R. Civ. P. 12(c) for Lack of Subject Matter Jurisdiction and Failure to State a Claim			R. BRPL, H, FRE 403			
0615		4/23/2021	[D1177] Corrected Joint Claim Construction Brief			R. BRPL, H, FRE 403			
0616		10/5/2020	[D1059] 10/02/2020 Transcript of Judge's Opinion on 9/30/20 Section 101 Hearing Case No:1:20-cv-00125-LPS			BRPL, H, FRE 403			
0617		4/28/2021	[D1185] 4/28/2021 Claim Construction Hearing Transcript			BRPL, H			
0618		4/7/2020	[D1187] Defendant and Counterclaim Plaintiff Natera, Inc.'s Notice of Motion and Motion for Summary Judgment of Invalidity, Infringement, and Limited Damages Due to Partial Unenforceability (Redacted), <i>Illumina, Inc. v. Natera, Inc.</i> , Case No:3:18-cv-01662-SI, NDCA			BRPL, R, FRE 403, H			
0619		6/2/2021	[D1243] Memorandum Opinion re Claim Construction Case No:1:20-cv-00125-LPS			BRPL, H			
0620		6/28/2021	[D1244] Order re Claim Construction Case No:1:20-cv-00125-LPS			BRPL, H			
0621		5/31/2021	[D113-2] Exhibit 3 U.S. Patent No. 10,262,755 Exemplary Infringement by Invitae, Inc. and Invitae Ltd. Case No:1:21-cv-00056-LPS			A. R. FRE 403, U, 602, NR			
0622		9/7/2021	[D1316] Defendants Letter Brief in Opposition to Natera's Motion to Amend Complaint to Assert Newly Corrected Claims of U.S. Patent No. 10,590,482			R. BRPL, H, FRE 403			
0623		9/8/2021	[D1320] Defendants' Opening Letter Brief in Support of Their Motion to Strike Portions of Natera, Inc.'s Final Infringement Contentions			R. BRPL, H, FRE 403			
0624		9/10/2021	[D1325] Defendants' Reply Letter Brief in Support of Their Motion to Strike Portions of Natera, Inc.'s Final Infringement Contentions			R. BRPL, H, FRE 403			
0625			508 Provisional "Methods for non-Invasive Prenatal Ploidy Calling and Paternity Calling"			A. R. FRE 403, FN			

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
0626		4/28/2003	Kamel A. Abd-Elisalam, "Bioinformatic tools and guideline for PCR primer design" African Journal of Biotechnology Vol.2 (5), pp. 91-95, May 2003	ARCHER00123062	ARCHER00123066	A, R, FRE 403, FN, H, MIL			
0627	HC-AEO		Excel Spreadsheet containing "Random Hexamer, Seq Primers, Adapter NPv1 ARR, qPCRQC, GSP1NPv1 ARR, P5_BC, P5, GSP2 NV1 ARR, Melting Temperatures, P7_BC, RXN Conditions, Sheet1, NTRK1 and PPARG"	ARCHER00091773	ARCHER00091773	A, R, FRE 403, FN, H, MIL			
0628		00/00/2006	M. Kane et al. "Application of less primer method to multiplex PCR" International Congress Series 1288 (2006)	ARCHER00124154	ARCHER00124156	A, R, FRE 403, FN, H, MIL			
0629		10/22/2004	A. Panjkovich and F. Melo, Comparison of different melting temperature calculation methods for short DNA sequences, Bioinformatics 21 (2005) 711-722	ARCHER00124656	ARCHER00124667	A, R, FRE 403, FN, H, MIL			
0630		8/16/2005	S. Chavali et al., Oligonucleotide properties determination and primer designing: a critical examination of predictions, Bioinformatics 21 (2005) 3918-3925	ARCHER00124668	ARCHER00124675	A, R, FRE 403, FN, H, MIL			
0631	HC-AEO		PNAS document "Supporting Information Fu et al. 10.1073/pans.1017621108"	ARCHER00128848	ARCHER00128849	A, R, FRE 403, FN, H			
0632	HC-AEO	11/1/2013	Enzymatics, Anchored Multiplex PCR (AMP) Technology	ARCHER01225183	ARCHER01225201	A, R, FRE 403, FN, H			
0633			enzymatics, catalyzing the genomic healthcare revolution, Archer ALK, RET, ROS1 Fusion Detection v1, Illumina Platform, P/IN AK0001-8, Rev. A	ARCHER00091755	ARCHER00091770	A, R, FRE 403, FN, H			
0634		3/1/1996	Guillaume Balavoine "Identification of members of several homeobox genes in planarian using a ligation-mediated polymerase chain reaction technique" Nucleic Acids Research Vol. 24, No. 8 1547-1553 (1996)	ARCHER00122874	ARCHER00122881	A, R, FRE 403, FN, H			
0635		02/00/2009	Signe Olivarius et al. "High-throughput verification of transcriptional Starting sites by Deep-RACE" BioTechniques 46:130-132	ARCHER00051100	ARCHER00051102	A, R, FRE 403, FN, H			
0636		11/00/2010	Diana W. Bianchi et al. "Insights Into Fetal and Neonatal Development Through Analysis of Cell-Free RNA in Body Fluids" NIH Public Access	ARCHER00051009	ARCHER00051019	A, R, FRE 403, FN, H			
0637		11/13/2013	Thomas M. Blomquist et al. "Targeted RNA- Sequencing with Competitive Multiplex PCR Amplicon Libraries" PLOS ONE Vol.8 Issue 11 (2013)	ARCHER00122133	ARCHER00122146	A, R, FRE 403, FN, H			
0638		10/21/2008	H. Christina Fan et al., "Noninvasive diagnosis of fetal aneuploidy by shotgun sequencing DNA from maternal blood" PNAS Vol. 105, No. 42	ARCHER00051030	ARCHER00051035	A, R, FRE 403, FN, H			
0639		4/13/2011	James A. Casbon et al. "A method for counting PCR template molecules with application to next-generation sequencing" Nucleic Acids Research, 2011, Vol. 39, No. 12	ARCHER00051116	ARCHER00051123	A, R, FRE 403, FN, H			
0640		6/12/2008	Po-Ling Chang et al. "Identification of individual DNA molecule of <i>Mycobacterium tuberculosis</i> by nested PCR-RFLP and capillary electrophoresis" Talanta 77 (2008) 182-188	ARCHER00124749	ARCHER00124755	A, R, FRE 403, FN, H			
0641		11/27/2012	U.S. Patent No. 8,318,430 (Chau et al.)	ARCHER00051369	ARCHER00051433	A, R, FRE 403, FN, H			
0642		00/00/1993	C.W. Dieffenbach et al. "General concepts for PCR primer design" CSH Press Genome Research	ARCHER00122865	ARCHER00122873	A, R, FRE 403, FN, H, MIL			
0643		2/18/2010	U.S. Patent Application Publication No. 2010/0041048 (Diehl)	ARCHER00122464	ARCHER00122588	A, R, FRE 403, FN, H			
0644		4/15/2011	Aniel Enrijman et al. "Transfer-PCR (TPCR): A highway for DNA cloning and protein engineering" Journal of Structural Biology 175 (2011) 171-177	ARCHER00124066	ARCHER00124072	A, R, FRE 403, FN, H			
0645		5/24/1994	U.S. Patent No. 5,314,809 (Erich et al.)	ARCHER00124756	ARCHER00124771	A, R, FRE 403, FN, H			
0646		5/30/2012	Tim Forshew et al. "Supplementary Materials for Noninvasive Identification and Monitoring of Cancer Mutations by Targeted Deep Sequencing of Plasma DNA" Science Translation Medicine 4 (2012)	ARCHER00122048	ARCHER00122067	A, R, FRE 403, FN, H			
0647		5/30/2012	Tim Forshew et al. "Noninvasive Identification and Monitoring of Cancer Mutations by Targeted Deep Sequencing of Plasma DNA" Science Translation Medicine 4 (2012)	ARCHER01526125	ARCHER01526137	A, R, FRE 403, FN, H			
0648		5/9/2013	U.S. Patent Application Publication No. 2013/0116130 (Fu et al.)	ARCHER00051599	ARCHER00051979	A, R, FRE 403, FN, H			
0649		2/1/2001	International Application Publication No. WO 01/07640 (Gill et al.)	ARCHER00124384	ARCHER00124475	A, R, FRE 403, FN, H			
0650		12/5/2000	U.S. Patent No. 6,156,504 (Gocke et al.)	ARCHER00051543	ARCHER00051573	A, R, FRE 403, FN, H			
0651		6/21/2006	Haitao Guo et al. "A specific and versatile genome walking technique" Gene 381, 18-23 (2006)	ARCHER00051267	ARCHER00051272	A, R, FRE 403, FN, H			
0652		00/00/2012	Daniela Sint et al. "Advances in multiplex PCR: balancing primer efficiencies and improving detection success" Methods in Ecology and Evolution 2012, 3, 898-905	ARCHER00051313	ARCHER00051320	A, R, FRE 403, FN, H			
0653		9/00/1999	William P. Halford "The essential prerequisites for quantitative RT-PCR" Nature Biotechnology Vol 17	ARCHER00122913	ARCHER00122913	A, R, FRE 403, FN, H			
0654		2/18/2008	Matthew J. Hayden et al. "Multiplex-Ready PCR: A new method for multiplexed SSR and SNP Genotyping" BMC Genomics (2008)	ARCHER00051321	ARCHER00051332	A, R, FRE 403, FN, H			
0655		9/00/1997	O. Henegariu et al. "Multiplex PCR: Critical Parameters and Step-by-Step Protocol" BioTechniques, Vol 23, No. 3	ARCHER00123002	ARCHER00123009	A, R, FRE 403, FN, H			
0656		6/15/2010	Myra D.T. Hosmillo et al. "Development of universal SYBR Green real-time RT-PCR for the rapid detection and quantification of bovine and porcine toroviruses" Journal of Virological Methods 168 (2010) 212-217	ARCHER00122968	ARCHER00122974	A, R, FRE 403, FN, H			
0657			John M.S. Bartlett et al. "PCR protocols Second Edition" Methods in Molecular Biology Vol. 226	ARCHER00123074	ARCHER00123592	A, R, FRE 403, FN, H			
0658		5/3/2011	Ruslan Kalendrar et al. "Java web tools for PCR, <i>in silico</i> PCR, and Oligonucleotide assembly analysis" Genomics 98 (2011) 137-144	ARCHER00122951	ARCHER00122958	A, R, FRE 403, FN, H, MIL			
0659		6/15/2005	Richard Owczarzy "Melting temperatures of nucleic acids: Discrepancies in analysis" Biophysical Chemistry 117 (2005) 207-215	ARCHER00124727	ARCHER00124735	A, R, FRE 403, FN, H, MIL			
0660		5/12/1992	Nicholas Chester et al. "Dimethyl Sulfoxide-Mediated Primer Tm Reduction: A Method for Analyzing the Role of Renaturation Temperature in the Polymerase Chain Reaction, Analytical Biochemistry 209, 284-290	ARCHER00129619	ARCHER00129625	A, R, FRE 403, FN, H, MIL			
0661		10/11/2007	M. Kane et al. "Application of less primer method to commercial kits" Forensic Science International: Genetics Supplement Series 1 (2008) 41-43	ARCHER00051342	ARCHER00051344	A, R, FRE 403, FN, H			
0662		6/7/2011	Isaac Kinde et al. "Detection and quantification of rare mutations with massively parallel sequencing" PNAS vol. 108 no. 23	ARCHER00051130	ARCHER00051135	A, R, FRE 403, FN, H			
0663		4/14/2011	Teemu Kivioja et al. "Counting absolute number of molecules using unique molecular identifiers" Nature Preceding's	ARCHER00051136	ARCHER00051153	A, R, FRE 403, FN, H			
0664		3/22/2007	Triinu Koressaar et al. "Enhancements and modifications of primer design program Primer3" Bioinformatics Applications Note Vol. 23 No. 10 (2007) pages 1289-1291	ARCHER00124746	ARCHER00124748	A, R, FRE 403, FN, H, MIL			
0665		12/2/1998	Irina Lavrentieva et al. "High polymorphism level of genomic sequences flanking insertion sites of human endogenous retroviral long terminal repeats" FEBS Letters 443 (1999)	ARCHER00051345	ARCHER00051351	A, R, FRE 403, FN, H			
0666		12/14/2006	U.S. Patent Application Publication No. 2006/0281105 (Li et al.)	ARCHER00052195	ARCHER00052212	A, R, FRE 403, FN, H			
0667		8/16/1997	Y.M. Dennis Lo et al. "Presence of fetal DNA in maternal plasma and serum" The Lancet, Vol 350	ARCHER00051036	ARCHER00051038	A, R, FRE 403, FN, H			
0668		1/00/2007	Y.M. Dennis Lo et al. "Prenatal diagnosis: progress through plasma nucleic acids" Nature Reviews Genetics Vol. 8	ARCHER00051039	ARCHER00051046	A, R, FRE 403, FN, H			
0669		12/8/2010	Y.M. Dennis Lo et al. "Maternal Plasma DNA Sequencing Reveals the Genome-Wide Genetic and Mutational Profile of the Fetus" Science Translation Medicine Vol 2 Issue 61	ARCHER00051053	ARCHER00051067	A, R, FRE 403, FN, H			
0670		2/00/1991	Elwyn Loh "Anchored PCR: Amplification with Single-Sided Specificity" Methods: A Companion to Methods in Enzymology Vol. 2, No. 1, 11-19 (1991)	ARCHER00124037	ARCHER00124045	A, R, FRE 403, FN, H			
0671		00/00/2000	Gerard G. Donohoe et al. "Rapid Single-Tube Screening of the C282Y Hemochromatosis Mutation by Real-Time Multiplex Allele-specific PCR without Fluorescent Probes, Clinical Chemistry 46:10, 1540-1547	ARCHER00122080	ARCHER00122087	A, R, FRE 403, FN, H			

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
0672		10/16/2001	P. Markoulatos et al. "Multiplex Polymerase Chain Reaction: A Practical Approach" Journal of Clinical Laboratory Analysis, 16:47-51	ARCHER00122882	ARCHER00122886	A, R, FRE 403, FN, H			
0673		5/29/2007	Megan L. McCloskey et al. "Encoding PCR Products with Batch-stamps and Barcodes"	ARCHER00051159	ARCHER00051164	A, R, FRE 403, FN, H			
0674		9/00/1998	Michael L. Metzker et al. "Quantitation of Mixed-Base Populations of HIV-1 Variants by Automated DNA Sequencing with BODIPY Dye-Labeled Primers" 25 BioTechniques, 446-62 (1998)	ARCHER00051281	ARCHER00051290	A, R, FRE 403, FN, H			
0675	HC-AEO	3/23/2021	Primer3 Release 2.3.6 Manual	NAT-AR-00329080	NAT-AR-00329123	R, FRE 403, FN, Q, MIL			
0676	HC-AEO	10/8/1997	John SantaLucia, JR. "A unified view of polymer, dumbbell, and oligonucleotide DNA nearest-neighbor thermodynamics" Proc. Natl. Acad. Sci USA 95 (1998)	NAT-AR-00329328	NAT-AR-00329334	A, R, FRE 403, FN, H			
0677		1/21/2008	Morie Nishiwaki et al. "Genotyping of Human Papillomaviruses by a Novel One-Step-Typing Method with Multiplex PCR and Clinical Applications" Journal of Clinical Microbiology Vol. 46 No. 4 (2008)	ARCHER00124087	ARCHER00124094	A, R, FRE 403, FN, H			
0678		3/29/1989	Osama Ohara et al. "One-sided polymerase chain reaction: The amplification of cDNA" Proc. Natl. Acad. Sci USA vol. 86, 5673-77 (1989)	ARCHER00051291	ARCHER00051295	A, R, FRE 403, FN, H			
0679		1/3/2009	Maria Paliko-Santini et al. "Large Scale multiplex PCR improves pathogen detection by DNA microarrays" BMC Microbiology (2009)	ARCHER00123040	ARCHER00123053	A, R, FRE 403, FN, H			
0680		10/11/2007	Poomima Parameswaran et al. "A pyrosequencing-tailored nucleotide barcode design unveils opportunities for large-scale sample multiplexing" Nucleic Acids Research, Vol. 35 No. 19 (2007)	ARCHER00051165	ARCHER00051173	A, R, FRE 403, FN, H			
0681		00/00/2004	Michael W. Pfaffl "Quantification strategies in real-time PCR" Chapter 3 pages 87-112 in: A-Z of quantitative PCR	ARCHER00122887	ARCHER00122912	A, R, FRE 403, FN, H			
0682		4/13/1999	J Proffitt et al. "Isolation and characterization of recombination events involving immunoglobulin heavy chain switch regions in multiple myeloma using long distance vectorette PCR (LDV-PCR)"	ARCHER00051296	ARCHER00051303	A, R, FRE 403, FN, H			
0683		8/22/1990	W. Rychlik et al. "Optimization of the annealing temperature for DNA amplification in vitro	ARCHER00051364	ARCHER00051368	A, R, FRE 403, FN, H			
0684		2/00/2003	Qiagen, QIAamp DNA Mini Kit and QIAamp DNA Blood Mini Kit Handbook, For DNA purification from Whole blood, Plasma, Serum, Buffy coat, Body fluids, Lymphocytes, Cultured Cells, Tissue, Swabs, Dried Blood Spots	ARCHER00122589	ARCHER00122656	A, R, FRE 403, FN, H			
0685		00/00/2007	John SantaLucia, Jr. "Physical Principles and Visual-OMP Software for Optimal PCR Design" Methods in Molecular Biology, Vol 402: PCR Primer Design	ARCHER00122091	ARCHER00122121	A, R, FRE 403, FN, H, MIL			
0686		12/15/2004	Michael H. Shaper et al. "MARA: a novel approach for highly multiplexed locus-specific SNP Genotyping using high-density DNA oligonucleotide arrays" Nucleic Acids Research, Vol. 32 No. 22 (2004)	ARCHER00051174	ARCHER00051182	A, R, FRE 403, FN, H, MIL			
0687		00/00/2010	Zhiyong Shen et al. "MPprimer: a program for reliable multiplex PCR primer design" BMC Bioinformatics (2010)	ARCHER00122931	ARCHER00122937	A, R, FRE 403, FN, H, MIL			
0688		2/9/1995	Paul D. Siebert et al. "An improved PCR method for walking in uncloned genomic DNA" Nucleic Acids Research Vol. 23, No. 6 (1995)	ARCHER00051352	ARCHER00051353	A, R, FRE 403, FN, H, MIL			
0689		11/21/1996	International Application Publication No. WO 96/36736 (Solomon et al.)	ARCHER00124337	ARCHER00124383	A, R, FRE 403, FN, H			
0690		5/10/1999	Diego Sperlini et al. "Screening of Transgenic Plants by Amplification of Unknown Genomic DNA Flanking T-DNA" BioTechniques 27 (1999)	ARCHER00051354	ARCHER00051359	A, R, FRE 403, FN, H			
0691		9/14/1999	U.S. Patent No. 5,952,170 (Stroun et al.)	ARCHER00051592	ARCHER00051598	A, R, FRE 403, FN, H			
0692		5/17/2011	Georgia Tounta et al. "Non-invasive prenatal diagnosis using cell-free fetal nucleic acids in maternal plasma: Progress overview beyond predictive and personalized diagnosis" EPMA Journal 2:163-171	ARCHER00051068	ARCHER00051076	A, R, FRE 403, FN, H			
0693		00/00/2011	Georgia Tounta et al. "A Multiplex PCR for Non-invasive Fetal RHD Genotyping Using Cell-free Fetal DNA" in vivo 25:411-418	ARCHER00051103	ARCHER00051109	A, R, FRE 403, FN, H			
0694		10/00/1992	Anthony B. Trout et al. "Ligation-anchored PCR: A simple amplification technique with single-sided specificity" Proc. Natl. Acad. Sci. USA Vol. 89 (1992)	ARCHER00051304	ARCHER00051307	A, R, FRE 403, FN, H			
0695		11/19/2004	N. Lale Satiroglu Tufan et al. "Analysis of Cell-Free Fetal DNA from Maternal Plasma and Serum Using a Conventional Multiplex PCR: Factors Influencing Success" Experimental/Laboratory Studies, Turk J Med Sci 35 (2005) 85-92	ARCHER00051194	ARCHER00051201	A, R, FRE 403, FN, H			
0696		8/00/2004	Peter M. Vallone "AutoDimer: a screening tool for primer-dimer and hairpin structures" BioTechniques Vol. 37 No.2 (2004)	ARCHER00122945	ARCHER00122950	A, R, FRE 403, FN, H			
0697		00/00/2008	Katherine Elena Varley et al. "Nested Patch PCR enables highly multiplexed mutation discovery in candidate genes" Genome Research 18:1844-1850	ARCHER00123018	ARCHER00123025	A, R, FRE 403, FN, H			
0698		5/5/2006	Wei-peng Wang et al. "Multiplex single nucleotide polymorphism genotyping by adapter ligation-mediated allele-specific amplification" Analytical Biochemistry 355 (2006)	ARCHER00051202	ARCHER00051210	A, R, FRE 403, FN, H			
0699		11/13/2008	U.S. Patent Application Publication No. 2008/0280292 (Wang et al.)	ARCHER00124095	ARCHER00124149	A, R, FRE 403, FN, H			
0700		11/19/2010	Sarah T. Wilkinson et al. "Decreased MHC class II expression in diffuse large B-cell lymphoma does not correlate with CpG methylation of C/TA promoters III and IV" NIH Public Access	ARCHER00122975	ARCHER00122980	A, R, FRE 403, FN, H			
0701		6/00/2000	Xiao Yan Zhong et al. "Detection of fetal Rhesus D and sex using fetal DNA from maternal plasma by multiplex polymerase chain reaction" British Journal of Obstetrics and Gynaecology Vol 107, pp. 766-769	ARCHER00051211	ARCHER00051214	A, R, FRE 403, FN, H			
0702		00/00/2011	Concise Oxford English Dictionary Twelfth Edition "Simplistic" definition			A, R, FRE 403, FN, H			
0703		3/30/2017	Declaration of Dr. John Quackenbush (Claims 65, 66, 72, 73, 75-77, 80-85) in <i>Guardant Health, Inc. v. Foundation Medicine, Inc.</i> , Case IPR2017-01170, Ex. 1002			BRPL, R, FRE 403, H, EXPERT			
0704		5/17/2021	Transcript re MSJ Section 101 in CareDx, Inc. v. Natera, Inc. - C.A. No. 19-567 (CFC) (CJB)			BRPL, R, FRE 403, H			
0705	HC-OAEO	00/00/2019	Archer Instructions for Use "MET Variant Test on the RevealDX Assay System for cDNA" Rev. 5 Archer Form "GMDX0059 - P5_02 10mM Tris/HCl, pH 8, Desalt [100 µM]" Rev. 1, Document Number: S19-W2-F59	ARCHER00027644	ARCHER00027667	A, R, C, FRE 403, FN			
0706	HC-OAEO	6/10/2019	Archer Form "GMDX0041 - PCR1 PRIMER P5_01" Rev. 2, Document Number: S19-W2-F41	ARCHER00037235	ARCHER00037241	A, R, C, FRE 403, FN			
0707	HC-OAEO	6/10/2019	Archer Form "GMDX0041 - PCR1 PRIMER P5_01" Rev. 2, Document Number: S19-W2-F41	ARCHER00037242	ARCHER00037248	A, R, C, FRE 403, FN			
0708	HC-OAEO		Archer MRD Assay "Pre-Submission Meeting Request: Pre-Idc Considerations"	ARCHER00044264	ARCHER00044307	A, R, C, FRE 403, FN			
0709	HC-AEO		Excel Spreadsheet re P7 Sequence by Part Number (used in PCR2)	ARCHER00049523	ARCHER00049523	A, R, C, FRE 403, FN, H			
0710	HC-AEO		Excel Spreadsheet re Sequences and Primer Function by Pool name	ARCHER00049524	ARCHER00049524	A, R, C, FRE 403, FN, H			
0711	HC-AEO		Excel Spreadsheet re Products and GSP Sequencing	ARCHER00049526	ARCHER00049526	A, R, C, FRE 403, FN, U, NR			
0712	HC-AEO		Excel Spreadsheet re GSP Document List with Descriptions and Cycle Information	ARCHER00049773	ARCHER00049773	A, R, C, FRE 403, FN, H			
0713	HC-AEO	5/31/2019	Archer Form "GMDX0051 - PCR2 PRIMER P7-01" Rev. 1, Document Number: S19-W2-F51	ARCHER00090930	ARCHER00090937	A, R, C, FRE 403, FN			
0714	HC-AEO	2/1/2019	Accepted Transplantation of Altug, Yucel, "Analytical Validation of a Single-Nucleotide Polymorphism-Based Donor-Derived Cell-Free DNA Assay for Detecting Rejection in Kidney Transplant Patients"	NAT-AR-00203966	NAT-AR-00204026	A, R, FRE 403			
0715		9/14/2021	Natera Prospera Transplant assessment "Prospera precision - from the experts of cell-free DNA testing," https://www.natera.com/wp-content/uploads/2021/01/PRO_BR_CommNeph_20210914_NAT-8020141_dwnld-1.pdf			A, R, FRE 403			
0716	HC-AEO	7/00/2013	Samango-Sprouse, Carole, et al. "SNP-based non-invasive prenatal testing detects sex chromosome aneuploidies with high accuracy" NIH Public Access Author Manuscript	ARCHER01993648	ARCHER01993660	A, R, FRE 403, FN, H			
0717		8/22/2019	U.S. Patent Application Publication No. 2019/0256907 A1 (Ryan et al.)			R, FRE 403, U, FN			
0718		8/22/2019	U.S. Patent Application Publication No. 2019/0256916 A1 (Babiarz et al.)			R, FRE 403, U, FN			
0719		8/22/2019	U.S. Patent Application Publication No. 2019/0256917 A1 (Babiarz et al.)			R, FRE 403, U, FN			
0720		7/15/1905	Illumina webpage "Evolving Adapter Ligation," https://www.illumina.com/techniques/sequencing/ngs-library-prep/ligation.html			A, R, FRE 403, U, FN			

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
0721		8/9/2019	ArcherDX, LLC Video "VariantPlex Anchored Multiplex PCR AMP," https://www.youtube.com/watch?v=Af2dSH5YMt4			A. R. FRE 403, U. FN			
0722		10/19/2017	International Publication No. WO 2017/181202 A2			R. FRE 403, U. FN			
0723		8/6/2020	U.S. Patent Application Publication No. 2020/0248266 A1 (Swanton et al.)			R. FRE 403, U. FN			
0724		9/12/2014	Juneau, Kara, et al., "Microarray-Based Cell-Free DNA Analysis Improves Noninvasive Prenatal Testing" Fetal Diagnosis and Therapy			A. R. FRE 403, U. FN			
0725		02/00/2011	Illumina "Paired-End Sample Preparation Guide" Rev. E			A. R. FRE 403, U. FN			
0726		9/16/2014	U.S. Patent No. 8,835,358 B2 (Fodor et al.)			A. R. FRE 403, U. FN			
0727		9/19/2016	Methods for Determining a Nucleotide Sequence Contiguous to a Known Target Nucleotide Sequence	NAT-AR-00708365	NAT-AR-00708684	R. FRE 403, U. FN			
0728		3/11/2013	SCORE Placeholder Sheet for IFW Content, Application Number: 13793564	NAT-AR-00708685	NAT-AR-00708976	R. FRE 403, U. FN			
0729			AGBT, About, https://www.agbt.org/about/about-agbt/			A. R. FRE 403, U. FN			
0730			Who We Are, AMP, https://www.amp.org/about/who-we-are/			A. R. FRE 403, U. FN			
0731			Past AMP Meetings, https://www.amp.org/events/past-amp-meetings/			A. R. FRE 403, U. FN			
0732		12/2/2020	Natera, Inc.'s First Supplemental Responses and Objections to ArcherDX, Inc.'s First Set of Interrogatories [Nos. 1-7]			BRPL, H. R. FRE 403, C			
0733	HC-AEO	12/18/2020	ArcherDX, Inc.'s First Supplemental Objections and Responses to Interrogatories 1, 3-6, 8 and 13, and Third Supplemental Objections and Responses to Interrogatory 2			BRPL, H. R. FRE 403, C			
0734	HC-AEO	7/12/2021	Exhibit 5 to Natera Infringement Contentions, Final Infringement Claim Chart for Archer's Accused Products and the '708 Patent			BRPL, FRE 403, R, H			
0735	HC-AEO	9/3/2021	Natera, Inc.'s First Supplemental Responses and Objections to Defendants' Fifth Set of Interrogatories [Nos. 17, 19, 21, and 22]			BRPL, H. R. FRE 403, C			
0736	HC-AEO	11/16/2020	Declaration of Jill Stefanelli, Ph.D.	ARCHER00110409	ARCHER00110418	BRPL, H. EXPERT, R. FRE 403			
0737	HC-AEO	1/22/2016	Email from J. Pham to I. Zlatkovsky regarding Natera quote and purchase	ARCHER01042577	ARCHER01042577	A. R. FRE 403, H, FN			
0738	HC-AEO	11/25/2015	Archer Invoice, Quote Name: 2015Nov. Natera. STP. Quote Number: 00000349	ARCHER01042578	ARCHER01042580	A. R. FRE 403, FN			
0739	HC-AEO	00/00/2014	Excel Spreadsheet Spreadsheet, AGT 2014 sign in sheet	ARCHER01223939	ARCHER01223939	A. R. FRE 403, FN			
0740	HC-AEO	2/26/2015	Email from J. Amsbaugh to J. Myers regarding Natera	ARCHER01268670	ARCHER01268670	A. R. FRE 403, H, FN			
0741	HC-AEO	00/00/2016	Excel Spreadsheet Spreadsheet, Archer Comprehensive Revenue Re	ARCHER01367715	ARCHER01367715	A. R. C			
0742	HC-AEO	2/25/2016	Archer Invoice, Quote Name: 2016_Feb_SS_1. Quote Number: 00000565	ARCHER01367732	ARCHER01367733	A. R. FRE 403, H, FN			
0743	HC-AEO	1/25/2016	Agenda for 2016 Personalized Medicine World Conference (PMWC 2016), Day 1 Program - January 25, 2016 through Day 3 Program - January 27, 2016	NAT-AR-00287647	NAT-AR-00287652	A. R. FRE 403, H, FN			
0744	HC-AEO	7/27/2016	Email from B. Zimmerman to S. Moshkevich regarding Re: 60% recovery rate	NAT-AR-00301867	NAT-AR-00301872	A. R. FRE 403, FN			
0745	HC-AEO	10/00/2016	Natera, cRNA Analysis Capability	NAT-AR-00308347	NAT-AR-00308353	R. FRE 403			
0746		10/5/2021	U.S. Patent No. 11,136,566 (Duchateau et al.)			A. R. FRE 403, H, FN, U			
0747		10/17/2019	U.S. Patent Application Publication No. 2019/0136100 (Duchateau et al.)			A. R. FRE 403, H, FN, U			
0748		12/6/2017	Changes in Patent Language to Ensure Eligibility Under Alice, By Peter Glaser & William Gvoth, https://pwatchdog.com/2017/12/06/changes-patent-language-ensure-eligibility-alice/id=90721/			A. R. FRE 403, H, FN, U			
0749			MPEP Foreword, USPTO, https://www.uspto.gov/web/offices/pac/mpep/mpep-0015-foreword.html			A. R. FRE 403, H, FN, U			
0750		9/25/2020	Proposed Stipulation and Order Regarding Case Consolidation (D.I. 52)			BRPL, FRE 403, R			
0751		1/7/2021	Natera, Inc.'s Responses and Objections to ArcherDX, Inc.'s Third Set of Interrogatories (No. 10) Defendants' Second Supplemental Objections and Responses to Interrogatory No. 1; Defendants' Third Supplemental Objections and Responses to Interrogatory No. 3; Defendants' Fifth Supplemental Objections and Responses to Interrogatory No. 4; Defendants' First Supplemental Objections and Responses to Interrogatory No. 6; Defendants' First Supplemental Objections and Responses to Interrogatory No. 9; Defendants' Third Supplemental Objections and Responses to Interrogatory No. 10; Defendants' First Supplemental Objections and Responses to Interrogatory No. 12; Defendants' First Supplemental Objections and Responses to Interrogatory No. 14			BRPL, H. R. FRE 403, C			
0752	HC-AEO	9/3/2021	S&P Capital IQ - ArcherDX, Inc. Private Company Profile	ARCHER00131613	ARCHER00131616	R. FRE 403, H, FN			
0753	HC-AEO	10/11/2021	S&P Capital IQ - Invitae Corporation (NYSE:NVTA) Public Company Profile	ARCHER00131617	ARCHER00131624	R. FRE 403, H, FN			
0754	HC-AEO	10/11/2021	S&P Capital IQ - Natera, Inc. (NasdaqGS:NTRA) Public Company Profile	ARCHER00131625	ARCHER00131630	R. FRE 403, H, FN			
0755	HC-AEO	10/11/2021	Natera, Inc. Form 10-K for the fiscal year ended December 31, 2020, https://www.sec.gov/Archives/edgar/data/0001604821/000155837021001907/ntra-20201231x10k.htm			R. FRE 403, H, FN			
0756		12/31/2020	Natera, Inc. Form 10-K for the fiscal year ended December 31, 2019, https://www.sec.gov/Archives/edgar/data/1604821/000155837020001821/ntra-20191231x10k8fb232.htm			R. FRE 403, H, FN			
0757	HC-AEO	12/31/2019	Archer Presentation, "Companion Diagnostic Overview"	ARCHER00041506	ARCHER00041540	R. FRE 403, FN			
0758	HC-AEO		Excel Spreadsheet containing Request, Financial Information, and Customer List	ARCHER00128027	ARCHER00128027	C			
0759	HC-AEO		Second Amendment to Exclusive Patent License Agreement A217008.05 between the General Hospital Corporation, d/b/a Massachusetts General Hospital and ArcherDX, Inc.	ARCHER00129460	ARCHER00129464	FRE 403			
0760	HC-AEO	6/23/2017	Archerdx, LLC - Manta Company Profile, https://www.manta.com/c/m48j8g/ArcherDX-llc	ARCHER00131609	ARCHER00131612	A. R. FRE 403, H, FN			
0761	HC-AEO		ArcherDX Investor Presentation, "Molecular pathology. Personalized."	ARCHER01005245	ARCHER01005275	A. R. FRE 403, H, FN			
0762	HC-AEO	3/00/2019	Archer Presentation, "ArcherMET and STRATAFIDE"	ARCHER01135565	ARCHER01135573	A. R. FRE 403, H, FN			
0763	HC-AEO		Archer Presentation, "PCM Roadmap Overview"	ARCHER01136947	ARCHER01136978	A. R. FRE 403, H, FN			
0764	HC-AEO	7/28/2020	Archer Presentation, "Stratified Roadmap Overview"	ARCHER01137936	ARCHER01137984	A. R. FRE 403, H, FN			
0765	HC-AEO	5/5/2020	Archer Presentation, "Stratified launch support and PCM strategy - PCM Strategy Workshop"	ARCHER01156894	ARCHER01156967	A. R. FRE 403, H, FN			
0766	HC-AEO	11/4/2019	ArcherDX, Inc. Form S-1, https://www.sec.gov/Archives/edgar/data/1734551/000162828020090906/archerdxs-1.htm			A			
0767	HC-AEO	6/5/2020	Archer Presentation, "PCM Overview"	ARCHER01467335	ARCHER01467349	R. FRE 403, FN			
0768	HC-AEO		Archer Presentation, "Personalized Cancer Monitoring Competitive Data"	ARCHER01642447	ARCHER01642466	R. FRE 403, FN			
0769	HC-AEO	6/2/2020	PRNewswire Press Release, "ArcherDX Personalized Cancer Monitoring (PCM) Technology Designated by FDA as Breakthrough Device," https://www.prnewswire.com/news-releases/ArcherDX-personalized-cancer-monitoring-pcm-technology-designated-by-fda-as-breakthrough-device-300986701.html	ARCHER01843663	ARCHER01843664	R. FRE 403, FN			
0770	HC-AEO	1/14/2020	"MRD assessment and treatment monitoring: Seeing beyond the limit"	NAT-AR-00170312	NAT-AR-00170319	R			
0771	HC-AEO		Excel Spreadsheet containing Data Request List, Trends in Units per Quarter, and Oncology Revenue and Profits						
0772	HC-AEO	00/00/2017 - 00/00/2022	PRNewswire Press Release, "ArcherDX Receives Approval for Archer® MET Companion Diagnostic for TEPMETKO® (Tepotinib) in Advanced Non-Small Cell Lung Cancer in Japan," https://www.prnewswire.com/news-releases/ArcherDX-receives-approval-for-ArcherMET-companion-diagnostic-for-tepmetko-tepotinib-in-advanced-non-small-cell-lung-cancer-in-japan-301029535.html	NAT-AR-00704157	NAT-AR-00704157	R. FRE 403			
0773	HC-AEO	3/25/2020	British Pound to US Dollar Spot Exchange Rates for 2020, https://www.exchangerates.org.uk/GBP-USD-spot-exchange-rates-history-2020.html	NAT-AR-00803334	NAT-AR-00803336	R. FRE 403			
0774		2020				A. R. FRE 403, FN, H, U			

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
0775		6/22/2020	Invitae Press Release "Invitae and ArcherDX to Create a Global Leader in Comprehensive Cancer Genetics and Precision Oncology," https://ir.invitae.com/news-and-events/press-releases/press-release-details/2020/Invitae-and-ArcherDX-to-create-a-global-leader-in-comprehensive-cancer-genetics-and-precision-oncology/default.aspx			A, R, FRE 403, FN, H, U			
0776		10/5/2020	Invitae Press Release "Invitae Completes Transaction with ArcherDX to Bring Comprehensive Cancer Genetics and Precision Oncology to Patients Worldwide," https://ir.invitae.com/news-and-events/press-releases/press-release-details/2020/Invitae-Completes-Transaction-with-ArcherDX-to-Bring-Comprehensive-Cancer-Genetics-and-Precision-Oncology-to-Patients-Worldwide/default.aspx			A, R, FRE 403, FN, H, U			
0777		8/6/2020	Complaint for Patent Infringement, C.A. No. 1:20-cv-01047, D.I. 1			BRPL, R, FRE 403			
0778		12/31/2019	Invitae Corporation Form 10-K for the fiscal year ended December 31, 2019, https://www.sec.gov/Archives/edgar/data/1501134/000150113420000013/nvta-12312019x10k.htm			A, R, FRE 403, FN, H, U, Q, FRE 611			
0779		12/31/2020	Invitae Corporation Form 10-K for the fiscal year ended December 31, 2020, https://www.sec.gov/Archives/edgar/data/1501134/000150113421000012/nvta-20201231.htm			A, R, FRE 403, FN, H, U, Q, FRE 611			
0780	HC-AEO	5/7/2020	Summary of Settlement Terms between Illumina, LabCorp., Illumina and Sequenom, Inc., and Natera, Inc.	NAT-AR-00439790	NAT-AR-00439795	R, FRE 403, FN			
0781	HC-AEO	2/24/2014	License Agreement between Natera, Inc. and DNA Diagnostics Center, Inc.	NAT-AR-00703223	NAT-AR-00703249	R, FRE 403, FN			
0782	HC-AEO	12/1/2017	License Agreement between The Jackson Laboratory and ArcherDX, Inc.	ARCHER02115670	ARCHER02115680	R, FRE 403, FN			
0783		11/11/2016	Natera, Inc.'s Objections to Magistrate Judge's Report and Recommendation on its Motion to Dismiss United States Securities and Exchange Commission Form 10-Q Natera, Inc. for the quarterly period ended June 30, 2020			BRPL, R, FRE 403, H, FN, U			
0784		8/6/2020	Archer CC Ex. B-4 - Xunlei Zhou et al., Nodal is a novel TGF- β -like gene expressed in the mouse node during gastrulation, 361 Letters to NATURE 543 (1993)			R, FRE 403, H, FN, U			
0785		2/11/1993	Archer CC Ex. B-5 - J. M. Rubio et al., Semi-Nested, Multiplex Polymerase Chain Reaction for Detection of Human Malaria Parasites and Evidence of Plasmodium Vivax Injection in Equatorial Guinea, 60 AMERICAN JOURNAL OF TROPICAL MEDICINE AND HYGIENE 183 (1999).			A, R, FRE 403, FN, H, U			
0786		00/00/1999	Archer CC Ex. B-6 - Alexei E. Mariani & Anastasia M. Zimmerman, Targets of somatic hypermutation within immunoglobulin light chain genes in zebrafish, 132 IMMUNOLOGY 240 (2010)			A, R, FRE 403, FN, H, U			
0787		00/00/2010	Archer CC Ex. B-7 - Ming Gao et al., Characterization of dult1, a Maize Gene Coding for a Novel Starch Synthase, 10 THE PLANT CELL 399 (1998)			A, R, FRE 403, FN, H, U			
0788		03/00/1998	Archer CC Ex. B-8 - Paul R. Heaton et al., Heminested PCR Assay for Detection of Six Genotypes of Rabies and Rabies-Related Viruses, 35 J. OF CLINICAL MICROBIOLOGY 2762 (1997).			A, R, FRE 403, FN, H, U			
0789		8/4/1997	Archer CC Ex. B-14 - Google search for "SO-adaptor sequence"			A, R, FRE 403, FN, H, U			
0790			Archer CC Ex. B-15 - Google search for "illumina sequencing tag"			A, R, FRE 403, FN, H, U			
0791			Archer CC Ex. B-16 - Marion Vanneste et al., 10 Functional Genomic Screening Independently Identifies CUL3 as a Mediator of Vemurafenib Resistance via Src-RAC1 Signaling Axis, 10 FRONTIERS IN ONCOLOGY 442 (2020).			A, R, FRE 403, FN, H, U			
0792		4/3/2020	Archer CC Ex. B-17 - U.S. Patent No. 8,195,415 (Fan et al.)			A, R, FRE 403, FN, H, U			
0793		6/5/2012	Archer CC Ex. B-19 - David J. Witherspoon et al., Mobile element scanning (MEScan) by targeted high-throughput sequencing, 11 BMC GENOMICS 410 (2010).			A, R, FRE 403, FN, H, U			
0794		00/00/2010	Archer CC Ex. B-30 - Pedro Miramontes & Germinal Cocho, DNA dimer correlations reflect in vivo conditions and discriminate among nearest-neighbor base pair free energy parameter measures, 321 Physica A 577 (2003)			A, R, FRE 403, FN, H, U			
0795		10/29/2002	Archer CC Ex. B-33 - Google search for "primer melting temperature calculator"			A, R, FRE 403, FN, H, U, MIL			
0796			Integrated DNA Technologies Specification Sheet, Order No. 16922507	ARCHER01422389	ARCHER01422401	R, FRE 403, FN			
0797	HC-AEO	7/13/2020	Sequencing Results	ARCHER01120795	ARCHER01120795	R, FRE 403, FN, H			
0798	HC-AEO		Genome Research (Kent) BLAT - The BLAST - Like Alignment Tool			R, FRE 403, FN			
0799		1/25/2002	Excel Spreadsheet containing Sequencing Results	ARCHER00049525	ARCHER00049525	R, FRE 403, FN, H			
0800	HC-AEO		Excel Spreadsheet containing Sequencing Results	ARCHER00048492	ARCHER00048492	R, FRE 403, FN, H			
0801	HC-AEO		Sequencing Results of different products			FRE 403, R, FN, A, FRE 1002-1003			
0802			Human BLAT Search Genome			A, R, FRE 403, FN, H, U			
0803			Human (hg38) BLAT Search Genome Results			A, R, FRE 403, FN, H, U			
0804			Human (hg38) BLAT Search Genome Results			A, R, FRE 403, FN, H, U			
0805			Human (hg38) BLAT Search Genome Results			A, R, FRE 403, FN, H, U			
0806			Human (hg38) BLAT Search Genome Results			A, R, FRE 403, FN, H, U			
0807		8/20/2013	U.S. Patent No. 8,515,679 B2			R, FRE 403, FN, H, U			
0808		5/6/2017	Expert Declaration of John Quackenbush, Ph.D.			A, R, FRE 403, FN, BPRL, EXPERT			
0809		6/11/2020	Declaration of Professor John Quackenbush, Ph.D.			A, R, FRE 403, FN, BPRL, EXPERT			
0810	HC-AEO		Archer Stratafide de Novo Request CTDNA Performance	ARCHER00129228	ARCHER00129359	A, R, FRE 403, FN, BPRL			
0811	HC-AEO		Archer Validation Study, Analytical and Methodological Validation of the Archer LiquidPlex Assay	ARCHER00041444	ARCHER00041445	R, C, FRE 403, FN			
0812	HC-AEO	9/20/2018	Archer User Manual Archer Analysis 6.0 User Manual	ARCHER01002213	ARCHER01002358	R, C, FRE 403, FN			
0813	HC-AEO		Archer Presentation "ArcherDX NGS oncology applications" (Stefanelli & Fugere)	ARCHER01002604	ARCHER01002638	R, C, FRE 403, FN			
0814	HC-AEO		Archer Report, STRATAFIDE cDNA BCT Comparison Design, & Development Study	ARCHER01875819	ARCHER01875845	R, C, FRE 403, FN			
0815		11/25/2020	Natera, Inc.'s Responses and Objections to ArcherDX, Inc.'s First Set of Interrogatories [Nos. 1-7]			BRPL, H, R, FRE 403, C			
0816	HC-AEO		Natera Document "Signatera Development R&R Study Lab Procedure and record for Operator 3"	NAT-AR-00133317	NAT-AR-00133329	R, FRE 403			
0817	HC-AEO		Natera Document "Signatera Development R&R Study Lab Procedure and record for Repeatability Arm"	NAT-AR-00133343	NAT-AR-00133355	R, FRE 403			
0818	HC-AEO		Natera Document "Signatera Plasma Laboratory Workflow SOP"	NAT-AR-00189550	NAT-AR-00189582	R, FRE 403			
0819			Primer3 Primer Design Spreadsheet			Q, A, U, NR, R, FRE 403, FN, MIL			
0820			Primer3 Release 2.3.0 Manual			A, U, NR, R, FRE 403, FN, C, MIL			
0821			Primer3 Release 2.3.1 Manual			A, U, NR, R, FRE 403, FN, C, MIL			
0822			Primer3 Release 2.3.2 Manual			A, U, NR, R, FRE 403, FN, C, MIL			
0823			Primer3 Release 2.3.4 Manual			A, U, NR, R, FRE 403, FN, C, MIL			
0824			Primer3 Release 2.3.5 Manual			A, U, NR, R, FRE 403, FN, C, MIL			
0825		5/16/2013	U.S. Patent Application Publication No. 2013/0123120 A1			A, R, FRE 403, FN			
0826	HC-AEO	4/8/2013	Natera document titled "NIPT Microdeletion Project Primer Pool Design" Phil Lacroute	NAT-AR-00133416	NAT-AR-00133434	A, R, FRE 403, FN, MIL			
0827	HC-AEO	5/31/2012	Email from M. Dodd to P. Lacroute re: "Columns for inclusion in primer design output file"	NAT-AR-00483491	NAT-AR-00483491	A, R, FRE 403, FN, MIL			
0828	HC-AEO	6/21/2012	Email from P. Lacroute to M. Dodd re: "primer design checklist"	NAT-AR-00483523	NAT-AR-00483523	A, R, FRE 403, FN, MIL			
0829	HC-AEO	5/25/2012	Email from M. Dodd to P. Lacroute re: "Primer design filters"	NAT-AR-00483525	NAT-AR-00483525	A, R, FRE 403, FN, MIL			
0830			Preliminary Infringement Claim Chart Archer's Accused Products and the '482 Patent for U.S. Patent No. 10,590,482			BRPL, H, R, FRE 403			
0831		3/17/2020	Request for Certificate of Correction for PTO Mistake Pursuant to 37 CFR Section 1.322(a) for Patent No. 10,590,482			R, FRE 403, MIL			
0832		4/30/2019	Part (A) Response for Certificates of Correction Patent No. 10,590,482			R, FRE 403, MIL			
0833			Final Infringement Claim Chart for Defendants' Accused Products and the '482 Patent in U.S. Patent No. 10,590,482			BRPL, H, R, FRE 403			

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
0834	HC-AEO		Text file containing data with DNA sequences	ARCHER00048493	ARCHER00048493	A. R. FRE 403, FN, H			
0835	HC-OAEO	2/16/2015	Archer document; lab notebook of Ian Kittrick from 2015-2017	ARCHER00003932	ARCHER00004295	A. R. FRE 403, FN, H			
0836	HC-OAEO	00/00/2019	Archer MET Product Insert	ARCHER000027697	ARCHER000027741	A. R. FRE 403, C			
0837	HC-OAEO		Archer MET Instructions for Use	ARCHER000027811	ARCHER000027857	A. R. FRE 403, C			
0838	HC-OAEO		Archer STRATAFIDE DNA Assay Procedure - Doc: AP2, Rev. 3	ARCHER000036383	ARCHER000036412	A. R. FRE 403, C			
0839	HC-OAEO		Archer presentation entitled "STRATAFIDE RNA Assay Procedure"	ARCHER000036417	ARCHER000036492	A. R. FRE 403, C, NR, FN			
0840	HC-OAEO		Archer STRATAFIDE RNA Assay Procedure - Doc: AP3, Rev. 1	ARCHER000036512	ARCHER000036544	A. R. FRE 403, C, FN			
0841	HC-OAEO		Archer STRATAFIDE ctDNA Assay Procedure - Doc: AP1, Rev. 1	ARCHER000036592	ARCHER000036619	A. R. FRE 403, C, FN			
0842	HC-OAEO		Archer document titled "Uncovering The Most Complex Genomic Alterations"	ARCHER000040865	ARCHER000040876	A. R. FRE 403, C, FN, NR			
0843	HC-OAEO		Archer presentation titled "Advancing Personalized Medicine"	ARCHER000040911	ARCHER000041105	A. R. FRE 403, C, FN			
0844	HC-OAEO	4/27/2020	Archer presentation titled "Deep molecular profiling of hematological malignancies"	ARCHER000041071	ARCHER000041105	A. R. FRE 403, C, FN			
0845	HC-OAEO		Archer document titled "Anchored Multiplex PCR enables sensitive NGS-based mutation detection and design flexibility for FFPE samples"	ARCHER000041263	ARCHER000041263	A. R. FRE 403, FN			
0846	HC-OAEO	00/00/2017	Archer Technical Note "The Use of Molecular Barcodes in Anchored Multiplex PCR"	ARCHER000041413	ARCHER000041415	A. R. FRE 403, FN			
0847	HC-OAEO	00/00/2020	Archer slide deck titled "Companion Diagnostic Overview/Commercial Capabilities Discussion"	ARCHER000041446	ARCHER000041503	A. R. FRE 403, C, FN			
0848	HC-OAEO	5/19/2020	Archer Master Validation Plan - Test Method Validation Plan For STRA TAFIDE ctDNA and RNA Kit Bundle	ARCHER000045479	ARCHER000045493	A. R. FRE 403, C			
0849	HC-OAEO		Archer document titled "ArcherDX DLBCL Assay Meeting Request"; requesting for meet between Feb. 28, 2018 and March 2, 2018.	ARCHER000047833	ARCHER000047915	A. R. FRE 403, C			
0850	HC-OAEO		Archer documents titled "ArcherDX DLBCL Assay Pre-Submission Package"	ARCHER000047955	ARCHER000048314	A. R. FRE 403, C, FN, H, NR			
0851	HC-AEO		Text file containing data with DNA sequences	ARCHER000048491	ARCHER000048491	A. R. FRE 403, C, FN, H, NR			
0852	HC-AEO		Text file containing data with DNA sequences	ARCHER000048494	ARCHER000048494	A. R. FRE 403, C, FN, H, NR			
0853	HC-AEO		Text file containing data with DNA sequences	ARCHER000048495	ARCHER000048495	A. R. FRE 403, C, FN, H, NR			
0854	HC-AEO		Text file containing data with DNA sequences	ARCHER000048496	ARCHER000048496	A. R. FRE 403, C, FN, H, NR			
0855	HC-AEO	9/20/2017	Archer VariantPlex Somatic Protocol for Illumina	ARCHER000049821	ARCHER000049840	A. R. FRE 403, C, FN			
0856	HC-AEO		Archer document titled "LiquidPlex ctDNA 28 - Part # SK0095"	ARCHER000049844	ARCHER000049847	A. R. FRE 403, C, FN			
0857	HC-AEO	4/16/2019	Archer FusionPlex Lung Focus Panel - Part # CSK5006 Panel Product Insert	ARCHER000049848	ARCHER000049850	A. R. FRE 403, C, FN			
0858	HC-AEO		Archer document titled "VariantPlex UVM Heme"; panel.	ARCHER000049851	ARCHER000049852	A. R. FRE 403, C, FN			
0859	HC-AEO		Archer VariantPlex Dynamic Inherited Cancer Panel Product Insert	ARCHER000049853	ARCHER000049854	A. R. FRE 403, C, FN			
0860	HC-AEO		Archer document titled "FusionPlex Pan Solid Tumor"; FusionPlex Custom Panel.	ARCHER000049855	ARCHER000049861	A. R. FRE 403, C, FN			
0861	HC-AEO		Archer document titled "FusionPlex Pan Solid Tumor - Part# SK0083"	ARCHER000049862	ARCHER000049865	A. R. FRE 403, C, FN			
0862	HC-AEO		Archer document titled "VariantPlex Custom Hemochromatosis"; VariantPlex Custom Panel.	ARCHER000049866	ARCHER000049867	A. R. FRE 403, C, FN			
0863	HC-AEO		Archer document titled "VariantPlex Dresden Erythrocytes"; VariantPlex Custom Panel.	ARCHER000049868	ARCHER000049869	A. R. FRE 403, C, FN			
0864	HC-AEO		Archer document titled "VariantPlex Cardiomyopathy"; VariantPlex Custom Panel.	ARCHER000049870	ARCHER000049872	A. R. FRE 403, C, FN			
0865	HC-AEO		Archer document titled "VariantPlex LimitlessDx Pharmacogenomics"; VariantPlex Custom Panel	ARCHER000049873	ARCHER000049875	A. R. FRE 403, C, FN			
0866	HC-AEO		ArcherVariantPlex OncoClinicas Solid Tumor v3 Panel Product Insert	ARCHER000049876	ARCHER000049878	A. R. FRE 403, C, FN			
0867	HC-AEO		Archer document titled "VariantPlex Austin Myeloid"; VariantPlex Custom HS/HGC Panel	ARCHER000049879	ARCHER000049880	A. R. FRE 403, C, FN			
0868	HC-AEO		Archer document titled "VariantPlex Austin Solid Tumor"; VariantPlex Custom HS/HGC Panel	ARCHER000049881	ARCHER000049882	A. R. FRE 403, C, FN			
0869	HC-AEO		Archer document titled "VariantPlex UHOC Leukemia v2"; VariantPlex Custom HS/HGC Panel	ARCHER000049883	ARCHER000049884	A. R. FRE 403, C, FN			
0870	HC-AEO		Archer document titled "VariantPlex USZ Lymphoid"; VariantPlex Custom HS/HGC Panel	ARCHER000049885	ARCHER000049886	A. R. FRE 403, C, FN			
0871	HC-AEO		Archer document titled "VariantPlex Duke Solid Tumor"; VariantPlex Custom HS/HGC Panel	ARCHER000049887	ARCHER000049888	A. R. FRE 403, C, FN			
0872	HC-AEO		Archer document titled "VariantPlex NHLBI Research Myeloid"; VariantPlex Custom HS/HGC Panel	ARCHER000049889	ARCHER000049890	A. R. FRE 403, C, FN			
0873	HC-AEO		Archer document titled "VariantPlex HHR"; VariantPlex Custom HS/HGC Panel	ARCHER000049891	ARCHER000049892	A. R. FRE 403, C, FN			
0874	HC-AEO		Archer document titled "VariantPlex 14 Gene AML"; VariantPlex Custom HS/HGC Panel	ARCHER000049893	ARCHER000049894	A. R. FRE 403, C, FN			
0875	HC-AEO		Archer document titled "VariantPlex Lung Focus"; VariantPlex Custom HS/HGC Panel	ARCHER000049895	ARCHER000049896	A. R. FRE 403, C, FN			
0876	HC-AEO		Archer document titled "VariantPlex Solid D28.3"; VariantPlex Custom HS/HGC Panel	ARCHER000049897	ARCHER000049898	A. R. FRE 403, C, FN			
0877	HC-AEO		Archer document titled "VariantPlex TJH Custom CTL+SMAD4"; VariantPlex Custom HS/HGC Panel	ARCHER000049899	ARCHER000049900	A. R. FRE 403, C, FN			
0878	HC-AEO		Archer document titled "VariantPlex KHCC Breast"; VariantPlex Custom HS/HGC Panel	ARCHER000049901	ARCHER000049902	A. R. FRE 403, C, FN			
0879	HC-AEO		Archer document titled "VariantPlex GenEra Brain"; VariantPlex Custom HS/HGC Panel	ARCHER000049903	ARCHER000049904	A. R. FRE 403, C, FN			
0880	HC-AEO		Archer document titled "VariantPlex NHLBI TP53"; VariantPlex Custom HS/HGC Panel	ARCHER000049905	ARCHER000049906	A. R. FRE 403, C, FN			
0881	HC-AEO		Archer document titled "VariantPlex IS NWS Myeloid"; VariantPlex Custom HS/HGC Panel	ARCHER000049907	ARCHER000049908	A. R. FRE 403, C, FN			
0882	HC-AEO		Archer document titled "VariantPlex TJH Brain"; VariantPlex Custom HS/HGC Panel	ARCHER000049909	ARCHER000049910	A. R. FRE 403, C, FN			
0883	HC-AEO		Archer document titled "VariantPlex Aiaggio Solid Tumor"; VariantPlex Custom HS/HGC Panel	ARCHER000049911	ARCHER000049913	A. R. FRE 403, C, FN			
0884	HC-AEO		Archer document titled "VariantPlex AML Focus v2"; VariantPlex Custom HS/HGC Panel	ARCHER000049914	ARCHER000049916	A. R. FRE 403, C, FN			
0885	HC-AEO		Archer document titled "VariantPlex Austin Lymphoma"; VariantPlex Custom HS/HGC Panel	ARCHER000049917	ARCHER000049919	A. R. FRE 403, C, FN			
0886	HC-AEO		Archer document titled "VariantPlex BCOH Oncology"; VariantPlex Custom HS/HGC Panel	ARCHER000049920	ARCHER000049921	A. R. FRE 403, C, FN			
0887	HC-AEO		Archer VariantPlex Cellmetix Core Lymphoma Panel Product Insert	ARCHER000049922	ARCHER000049924	A. R. FRE 403, C, FN			
0888	HC-AEO		Archer VariantPlex CHU Rouen Panel Product Insert	ARCHER000049925	ARCHER000049927	A. R. FRE 403, C, FN			
0889	HC-AEO		Archer document titled "VariantPlex CRISPRTX FAAH"; VariantPlex Custom HS/HGC Panel	ARCHER000049928	ARCHER000049930	A. R. FRE 403, C, FN			
0890	HC-AEO		Archer document titled "VariantPlex DermTech"; VariantPlex Custom HS/HGC Panel	ARCHER000049931	ARCHER000049933	A. R. FRE 403, C, FN			
0891	HC-AEO		Archer document titled "VariantPlex DLONGWOOD TP53"; VariantPlex Custom HS/HGC Panel	ARCHER000049934	ARCHER000049936	A. R. FRE 403, C, FN			
0892	HC-AEO		Archer document titled "VariantPlex FLT3-ITD and NPM1"; VariantPlex Custom HS/HGC Panel	ARCHER000049937	ARCHER000049939	A. R. FRE 403, C, FN			
0893	HC-AEO		Archer document titled "VariantPlex Hemochromatosis v2"; VariantPlex Custom HS/HGC Panel	ARCHER000049940	ARCHER000049942	A. R. FRE 403, C, FN			
0894	HC-AEO		Archer document titled "VariantPlex Hong Kong Children's"; VariantPlex Custom HS/HGC Panel	ARCHER000049943	ARCHER000049945	A. R. FRE 403, C, FN			
0895	HC-AEO		Archer document titled "VariantPlex John Hunter Solid Tumor Focus"; VariantPlex Custom HS/HGC Panel	ARCHER000049946	ARCHER000049948	A. R. FRE 403, C, FN			
0896	HC-AEO		Archer document titled "VariantPlex Karaiskakis Foundation Comprehensive Solid Tumor"; VariantPlex Custom HS/HGC Panel	ARCHER000049949	ARCHER000049951	A. R. FRE 403, C, FN			
0897	HC-AEO		Archer document titled "VariantPlex Karaiskakis Solid Tumor"; VariantPlex Custom HS/HGC Panel	ARCHER000049952	ARCHER000049954	A. R. FRE 403, C, FN			
0898	HC-AEO		Archer document titled "FusionPlex Takara Bio"; FusionPlex Custom Panel	ARCHER000049955	ARCHER000049956	A. R. FRE 403, C, FN			
0899	HC-AEO		Archer document titled "VariantPlex NNGM Lung Focus v2"; VariantPlex Custom HS/HGC Panel	ARCHER000049957	ARCHER000049959	A. R. FRE 403, C, FN			
0900	HC-AEO		Archer document titled "VariantPlex OHSU Heme Tier 1"; VariantPlex Custom HS/HGC Panel	ARCHER000049960	ARCHER000049962	A. R. FRE 403, C, FN			
0901	HC-AEO		Archer document titled "VariantPlex OHSU Heme Tier 2"; VariantPlex Custom HS/HGC Panel	ARCHER000049963	ARCHER000049965	A. R. FRE 403, C, FN			
0902	HC-AEO		Archer document titled "VariantPlex PIK3CA"; VariantPlex Custom HS/HGC Panel	ARCHER000050011	ARCHER000050012	A. R. FRE 403, C, FN			
0903	HC-AEO		Archer document titled "LiquidPlex Merus CRC"; LiquidPlex Custom Panel	ARCHER000050013	ARCHER000050014	A. R. FRE 403, C, FN			
0904	HC-AEO		Archer document titled "LiquidPlex MDA MCL v2"; LiquidPlex Custom Panel	ARCHER000050015	ARCHER000050016	A. R. FRE 403, C, FN			
0905	HC-AEO		Archer document titled "LiquidPlex Leidos MMR"; LiquidPlex Custom Panel	ARCHER000050017	ARCHER000050017	A. R. FRE 403, C, FN			
0906	HC-AEO		Archer document titled "LiquidPlex Linz Pancreas"; LiquidPlex Custom Panel	ARCHER000050019	ARCHER000050020	A. R. FRE 403, C, FN			
0907	HC-AEO		Archer document titled "LiquidPlex SeraCare Gmini"; LiquidPlex Custom Panel	ARCHER000050021	ARCHER000050022	A. R. FRE 403, C, FN			
0908	HC-AEO		Archer document titled "LiquidPlex 28 + BRCA1/2"; LiquidPlex Custom Panel	ARCHER000050023	ARCHER000050024	A. R. FRE 403, C, FN			
0909	HC-AEO		Archer document titled "LiquidPlex CBL"; LiquidPlex Custom Panel	ARCHER000050025	ARCHER000050026	A. R. FRE 403, C, FN			
0910	HC-AEO		Archer document titled "LiquidPlex Celgene"; LiquidPlex Custom Panel	ARCHER000050027	ARCHER000050029	A. R. FRE 403, C, FN			
0911	HC-AEO		Archer LiquidPlex Celgene Panel Product Insert	ARCHER000050030	ARCHER000050031	A. R. FRE 403, C, FN			

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
0912	HC-AEO		Archer document titled "LiquidPlex Comprehensive NCH Solid Tumor"; LiquidPlex Custom Panel	ARCHER00050032	ARCHER00050034	A. R. FRE 403, C. FN			
0913	HC-AEO		Archer document titled "LiquidPlex Lung Focus"; LiquidPlex Custom Panel	ARCHER00050035	ARCHER00050036	A. R. FRE 403, C. FN			
0914	HC-AEO		Archer document titled "LiquidPlex Oxford CEDAR"; LiquidPlex Custom Panel	ARCHER00050037	ARCHER00050038	A. R. FRE 403, C. FN			
0915	HC-AEO		Archer document titled "FusionPlex Carolinas Health Pan Heme"; LiquidPlex Custom Panel	ARCHER00050039	ARCHER00050040	A. R. FRE 403, C. FN			
0916	HC-AEO		Archer document titled "FusionPlex CD19"; LiquidPlex Custom Panel	ARCHER00050041	ARCHER00050042	A. R. FRE 403, C. FN			
0917	HC-AEO		Archer FusionPlexo CHOP v3 Panel Product Insert	ARCHER00050043	ARCHER00050044	A. R. FRE 403, C. FN			
0918	HC-AEO		Archer document titled "FusionPlex CHW Solid Tumour"; FusionPlex Custom Panel	ARCHER00050045	ARCHER00050046	A. R. FRE 403, C. FN			
0919	HC-AEO		Archer document titled "FusionPlex COH Pan Cancer"; FusionPlex Custom Panel	ARCHER00050047	ARCHER00050048	A. R. FRE 403, C. FN			
0920	HC-AEO		Archer document titled "FusionPlex UTHSC Solid Tumor"; FusionPlex Custom Panel	ARCHER00050049	ARCHER00050050	A. R. FRE 403, C. FN			
0921	HC-AEO		Archer document titled "FusionPlex MUG Sarcoma v4"; FusionPlex Custom Panel	ARCHER00050051	ARCHER00050052	A. R. FRE 403, C. FN			
0922	HC-AEO		Archer document titled "FusionPlex GenEra Brain"; FusionPlex Custom Panel	ARCHER00050053	ARCHER00050054	A. R. FRE 403, C. FN			
0923	HC-AEO		Archer document titled "FusionPlex SNUH Lung"; FusionPlex Custom Panel	ARCHER00050055	ARCHER00050056	A. R. FRE 403, C. FN			
0924	HC-AEO	00/00/2019	Archer document titled "FusionPlex Universal Solid Tumor"; FusionPlex Custom Panel	ARCHER00050057	ARCHER00050058	A. R. FRE 403, C. FN			
0925	HC-AEO	00/00/2019	Archer document titled "FusionPlex IBIS ESS"; FusionPlex Custom Panel	ARCHER00050059	ARCHER00050060	A. R. FRE 403, C. FN			
0926	HC-AEO	00/00/2019	Archer document titled "FusionPlex Ibis Lung"; FusionPlex Custom Panel	ARCHER00050061	ARCHER00050062	A. R. FRE 403, C. FN			
0927	HC-AEO	00/00/2019	Archer document titled "FusionPlex IPA Small v1"; FusionPlex Custom Panel	ARCHER00050063	ARCHER00050064	A. R. FRE 403, C. FN			
0928	HC-AEO	00/00/2019	Archer document titled "FusionPlex Komagome Sarcoma"; FusionPlex Custom Panel	ARCHER00050065	ARCHER00050066	A. R. FRE 403, C. FN			
0929	HC-AEO	00/00/2019	Archer document titled "FusionPlex NCJ Focus"; FusionPlex Custom Panel	ARCHER00050067	ARCHER00050068	A. R. FRE 403, C. FN			
0930	HC-AEO	00/00/2019	Archer document titled "FusionPlex NCI Sarcoma"; FusionPlex Custom Panel	ARCHER00050069	ARCHER00050070	A. R. FRE 403, C. FN			
0931	HC-AEO	00/00/2019	Archer document titled "FusionPlex OncoClinicas Solid Tumor v2"; FusionPlex Custom Panel	ARCHER00050071	ARCHER00050072	A. R. FRE 403, C. FN			
0932	HC-AEO	00/00/2019	Archer document titled "FusionPlex MJG Sarcoma v5"; FusionPlex Custom Panel	ARCHER00050073	ARCHER00050074	A. R. FRE 403, C. FN			
0933	HC-AEO	00/00/2019	Archer document titled "FusionPlex Seattle Children's Heme v4"; FusionPlex Custom Panel	ARCHER00050075	ARCHER00050076	A. R. FRE 403, C. FN			
0934	HC-AEO	00/00/2019	Archer document titled "FusionPlex BCOH Histiocytosis v2"; FusionPlex Custom Panel	ARCHER00050077	ARCHER00050078	A. R. FRE 403, C. FN			
0935	HC-AEO	00/00/2019	Archer document titled "FusionPlex Bioplica AST2"; FusionPlex Custom Panel	ARCHER00050079	ARCHER00050080	A. R. FRE 403, C. FN			
0936	HC-AEO	00/00/2019	Archer document titled "FusionPlex Bioplica SAR6"; FusionPlex Custom Panel	ARCHER00050081	ARCHER00050082	A. R. FRE 403, C. FN			
0937	HC-AEO	00/00/2019	Archer document titled "FusionPlex CCF Heme"; FusionPlex Custom Panel	ARCHER00050083	ARCHER00050084	A. R. FRE 403, C. FN			
0938	HC-AEO	00/00/2019	Archer document titled "FusionPlex CHU GTS Cerebral"; FusionPlex Custom Panel	ARCHER00050085	ARCHER00050086	A. R. FRE 403, C. FN			
0939	HC-AEO	00/00/2019	Archer document titled "FusionPlex CHU Lyon Pan Solid Tumor Sarcoma"; FusionPlex Custom Panel	ARCHER00050087	ARCHER00050088	A. R. FRE 403, C. FN			
0940	HC-AEO	00/00/2019	Archer document titled "FusionPlex Cologne Lymphoma"; FusionPlex Custom Panel	ARCHER00050089	ARCHER00050090	A. R. FRE 403, C. FN			
0941	HC-AEO	00/00/2019	Archer document titled "FusionPlex Cologne Salivary"; FusionPlex Custom Panel	ARCHER00050091	ARCHER00050092	A. R. FRE 403, C. FN			
0942	HC-AEO	00/00/2019	Archer document titled "FusionPlex Cologne Sarcoma"; FusionPlex Custom Panel	ARCHER00050093	ARCHER00050094	A. R. FRE 403, C. FN			
0943	HC-AEO	00/00/2019	Archer document titled "FusionPlex D-MARK Lung"; FusionPlex Custom Panel	ARCHER00050095	ARCHER00050096	A. R. FRE 403, C. FN			
0944	HC-AEO	00/00/2019	Archer document titled "FusionPlex Dusseldorf Lung and Neuro"; FusionPlex Custom Panel	ARCHER00050097	ARCHER00050098	A. R. FRE 403, C. FN			
0945	HC-AEO	00/00/2019	Archer document titled "FusionPlex Essen Sarcoma"; FusionPlex Custom Panel	ARCHER00050099	ARCHER00050100	A. R. FRE 403, C. FN			
0946	HC-AEO	00/00/2019	Archer document titled "FusionPlex Comprehensive Sarcoma"; FusionPlex Custom Panel	ARCHER00050101	ARCHER00050102	A. R. FRE 403, C. FN			
0947	HC-AEO	00/00/2019	Archer document titled "FusionPlex IPA custom large panel V1"; FusionPlex Custom Panel	ARCHER00050103	ARCHER00050104	A. R. FRE 403, C. FN			
0948	HC-AEO	00/00/2019	Archer document titled "FusionPlex Leidos-NCI Pan Solid Tumor"; FusionPlex Custom Panel	ARCHER00050105	ARCHER00050106	A. R. FRE 403, C. FN			
0949	HC-AEO	00/00/2019	Archer document titled "FusionPlex Maestro ACC Expanded Sarcoma"; FusionPlex Custom Panel	ARCHER00050107	ARCHER00050108	A. R. FRE 403, C. FN			
0950	HC-AEO	00/00/2019	Archer document titled "FusionPlex MelanoLung"; FusionPlex Custom Panel	ARCHER00050109	ARCHER00050110	A. R. FRE 403, C. FN			
0951	HC-AEO	00/00/2019	Archer document titled "FusionPlex NTRK"; FusionPlex Custom Panel	ARCHER00050111	ARCHER00050112	A. R. FRE 403, C. FN			
0952	HC-AEO	00/00/2019	Archer document titled "FusionPlex Oncode Lung"; FusionPlex Custom Panel	ARCHER00050113	ARCHER00050114	A. R. FRE 403, C. FN			
0953	HC-AEO	00/00/2019	Archer document titled "FusionPlex OPBG Pediatric Cancer"; FusionPlex Custom Panel	ARCHER00050115	ARCHER00050116	A. R. FRE 403, C. FN			
			Archer document titled "FusionPlex Opera Padre Pio NRG"; Panel Product Insert, FusionPlex Custom Panel"						
0954	HC-AEO	00/00/2019		ARCHER00050117	ARCHER00050118	A. R. FRE 403, C. FN			
0955	HC-AEO	00/00/2019	Archer document titled "FusionPlex Saint Louis CTL"; FusionPlex Custom Panel	ARCHER00050119	ARCHER00050120	A. R. FRE 403, C. FN			
0956	HC-AEO	00/00/2019	Archer document titled "FusionPlex SFav3"; FusionPlex Custom Panel	ARCHER00050121	ARCHER00050122	A. R. FRE 403, C. FN			
0957	HC-AEO	00/00/2019	Archer document titled "FusionPlex SNUH Pan Cancer"; FusionPlex Custom Panel	ARCHER00050123	ARCHER00050124	A. R. FRE 403, C. FN			
0958	HC-AEO	00/00/2019	Archer document titled "FusionPlex Takara Bio"; FusionPlex Custom Panel	ARCHER00050125	ARCHER00050126	A. R. FRE 403, C. FN			
0959	HC-AEO	00/00/2019	Archer document titled "FusionPlex TCH Heme"; FusionPlex Custom Panel	ARCHER00050127	ARCHER00050128	A. R. FRE 403, C. FN			
0960	HC-AEO	00/00/2019	Archer document titled "FusionPlex TRACRx NSCLC"; FusionPlex Custom Panel	ARCHER00050129	ARCHER00050130	A. R. FRE 403, C. FN			
0961	HC-AEO	00/00/2019	Archer document titled "FusionPlex Tubingen Brain Focus"; FusionPlex Custom Panel	ARCHER00050131	ARCHER00050132	A. R. FRE 403, C. FN			
0962	HC-AEO	00/00/2019	Archer document titled "FusionPlex Tubingen GLI1"; FusionPlex Custom Panel	ARCHER00050133	ARCHER00050134	A. R. FRE 403, C. FN			
0963	HC-AEO	00/00/2019	Archer document titled "FusionPlex University Cologne FP Kinderonko"; FusionPlex Custom Panel	ARCHER00050135	ARCHER00050136	A. R. FRE 403, C. FN			
0964	HC-AEO	00/00/2019	Archer document titled "FusionPlex Weill Cornell Sarcoma"; FusionPlex Custom Panel	ARCHER00050137	ARCHER00050138	A. R. FRE 403, C. FN			
			Archer document titled "FusionPlex Expanded Sarcoma"; Panel Product Insert FusionPlex Custom Panel						
0965	HC-AEO	00/00/2019		ARCHER00050139	ARCHER00050146	A. R. FRE 403, C. FN			
0966	HC-AEO	00/00/2019	Archer document titled "FusionPlex Expanded Sarcoma" Panel Product Insert FusionPlex Custom Panel						
0967	HC-AEO	00/00/2019	Archer document titled "FusionPlex MSKCC Solid Tumor v5"; FusionPlex Custom Panel	ARCHER00050155	ARCHER00050156	A. R. FRE 403, C. FN			
0968	HC-AEO	00/00/2020	Archer document titled "LiquidPlex 28 + BRCA1/2"; LiquidPlex Custom Panel	ARCHER00050263	ARCHER00050264	A. R. FRE 403, C. FN			
0969	HC-AEO	00/00/2020	Archer document titled "LiquidPlex CBL"; LiquidPlex Custom Panel	ARCHER00050265	ARCHER00050266	A. R. FRE 403, C. FN			
0970	HC-AEO	00/00/2020	Archer document titled "LiquidPlex Celgene"; LiquidPlex Custom Panel	ARCHER00050267	ARCHER00050269	A. R. FRE 403, C. FN			
0971	HC-AEO	00/00/2020	Archer document titled "LiquidPlex Comprehensive NCH Solid Tumor"; LiquidPlex Custom Panel	ARCHER00050270	ARCHER00050272	A. R. FRE 403, C. FN			
0972	HC-AEO	00/00/2020	Archer document titled "LiquidPlex Lung Focus"; LiquidPlex Custom Panel	ARCHER00050273	ARCHER00050274	A. R. FRE 403, C. FN			
0973	HC-AEO	00/00/2020	Archer document titled "LiquidPlex Oxford CEDAR"; LiquidPlex Custom Panel	ARCHER00050275	ARCHER00050276	A. R. FRE 403, C. FN			
0974	HC-AEO	5/28/2019	Co-marketing and Sales Representation Agreement between Genosity, Inc. and ArcherDX, Inc.	ARCHER00091793	ARCHER00091818	A. FN, R			
0975	HC-AEO	10/11/2019	Technology License and Technical Assistance Agreement between Genosity, Inc. and ArcherDX, Inc.	ARCHER00091819	ARCHER00091838	A. FN, R			
0976	HC-AEO	4/23/2018	Archer document titled "Mutual Confidentiality Agreement between ArcherDX, Inc. and Genosity LLC"	ARCHER00091839	ARCHER00091841	A. FN, R			
			Archer document titled "Archer Analysis Unlimited Agreement between Analysis Unlimited and H3 Biomedicine, Inc."						
0977	HC-AEO	6/11/2018		ARCHER00091842	ARCHER00091850	A. FN, R			
0978	HC-AEO	07/29/2020; 07/30/2020	Mutual Confidentiality Agreement between ArcherDX, Genosity, and H3 Biomedicine, Inc.	ARCHER00091851	ARCHER00091854	A. FN, R			
0979	HC-AEO	07/21/2020; 07/22/2020	Mutual Confidentiality Agreement between H3 Biomedicine, Inc. and ArcherDx, Inc.	ARCHER00091855	ARCHER00091858	A. FN, R			
0980	HC-AEO	8/15/2018	Archer document titled "Agreement: H3B-8800 Custom Myeloid2 between ArcherDX and H3 Biomedicine, Inc."	ARCHER00091859	ARCHER00091867	A. FN, R			
0981	HC-AEO	6/28/2018	Master Laboratory Services Agreement between H3 Biomedicine, Inc. and ArcherDX, Inc.	ARCHER00091868	ARCHER00091883	A. FN, R			
0982	HC-AEO	06/28/2018	Work Order No. A-1 H3B-8800 Custom Panel between H3 Biomedicine, Inc. and ArcherDx, Inc.	ARCHER00091884	ARCHER00091892	A. FN, R			
			Archer document titled "Work Order No. A-2 Feasibility: Limit of Detection (LOD) and CLIA/CAP Validation between H3 Biomedicine, Inc. and ArcherDx, Inc."						
0983	HC-AEO	6/29/2018		ARCHER00091893	ARCHER00091898	A. FN, R			
0984	HC-AEO	2/9/2018	Material Transfer Agreement between ArcherDX, Inc. and H3 Biomedicine, Inc.	ARCHER00091899	ARCHER00091902	A. FN, R			
0985	HC-AEO	00/00/2019	Archer document titled "Archer Whole Exome Assay; Doc No AP0006, Rev 1"	ARCHER00091903	ARCHER00091942	A. R. FRE 403, C. FN			

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
0986	HC-AEO	00/00/2016	Archer document titled "Best Practices and Troubleshooting Guide"; Archer FusionPlex Library Presentation	ARCHER00091943	ARCHER00091946	A, R, FRE 403, C, FN			
0987	HC-AEO	7/9/2020	Archer document titled "Archer LiquidPlex Protocol for Illumina"	ARCHER00091947	ARCHER00091968	A, R, FRE 403, C, FN			
0988	HC-AEO	9/20/2017	Archer document titled "Archer Reveal cDNA Protocol for Illumina"	ARCHER00091969	ARCHER00091986	A, R, FRE 403, C, FN			
0989	HC-AEO	6/26/2018	Archer document titled "Archer Immunoverse-HS TCR Protocol for Illumina"	ARCHER00091987	ARCHER00092010	A, R, FRE 403, C, FN			
0990	HC-AEO	7/23/2020	Archer FusionPlex Protocol for Illumina	ARCHER00092011	ARCHER00092036	A, R, FRE 403, C, FN			
0991	HC-AEO	00/00/2020	Archer document titled "LiquidPlex cDNA 28 - Part # SK0095"; Panel Product Insert LiquidPlex cDNA 28	ARCHER00092037	ARCHER00092039	A, R, FRE 403, C, FN			
0992	HC-AEO	00/00/2020	Archer document titled "LiquidPlex cDNA 28 - Part # SK0095"; Panel Product Insert LiquidPlex cDNA 28	ARCHER00092040	ARCHER00092042	A, R, FRE 403, C, FN			
0993	HC-AEO	00/00/2017	Archer document titled "Reveal cDNA 28 - Part # SK0095, SK0106"; Panel Product Insert Reveal cDNA 28	ARCHER00092043	ARCHER00092045	A, R, FRE 403, C, FN			
0994	HC-AEO	00/00/2019	Archer document titled "FusionPlex Solid Tumor Part # SK0083"; FusionPlex Solid Tumor	ARCHER00092046	ARCHER00092049	A, R, FRE 403, C, FN			
0995	HC-AEO	00/00/2019	Archer document titled "FusionPlex CTL Part # SK0084"; Panel Product Insert FusionPlex CTL	ARCHER00092050	ARCHER00092053	A, R, FRE 403, C, FN			
0996	HC-AEO	00/00/2019	Archer document titled "FusionPlex CTL Part # SK0084"; Panel Product Insert FusionPlex CTL	ARCHER00092054	ARCHER00092057	A, R, FRE 403, C, FN			
0997	HC-AEO	00/00/2019	Archer document titled "FusionPlex Myeloid Part # SK0088"; Panel Product Insert FusionPlex Myeloid	ARCHER00092058	ARCHER00092063	A, R, FRE 403, C, FN			
0998	HC-AEO	2/16/2017	Archer document titled "Archer VariantPlex Protocol for Illumina"	ARCHER00092064	ARCHER00092080	A, R, FRE 403, C, FN			
0999	HC-AEO	11/12/2019	Archer document titled "Archer VariantPlex HS/HGC Protocol for Illumina"	ARCHER00092081	ARCHER00092099	A, R, FRE 403, C, FN			
1000	HC-AEO	9/20/2017	Archer document titled "Archer VariantPlex Somatic Protocol for Illumina"	ARCHER00092100	ARCHER00092119	A, R, FRE 403, C, FN			
1001	HC-AEO	00/00/2017	Archer document titled "Archer VariantPlex Solid Tumor Part # SK0111"; Panel Product Insert VariantPlex Solid Tumor	ARCHER00092120	ARCHER00092123	A, R, FRE 403, C, FN			
1002	HC-AEO	00/00/2018	Archer document titled "VariantPlex Core Myeloid Part # SK0121"; Panel Product Insert VariantPlex Core Myeloid	ARCHER00092124	ARCHER00092128	A, R, FRE 403, C, FN			
1003	HC-AEO	00/00/2018	Archer document titled "VariantPlex BRCA v2" Panel Product Insert VariantPlex Custom Panel	ARCHER00092129	ARCHER00092130	A, R, FRE 403, C, FN			
1004	HC-AEO	00/00/2019	Archer document titled "VariantPlex BRCA v2" Panel Product Insert VariantPlex Custom HS/HGC Panel	ARCHER00092131	ARCHER00092132	A, R, FRE 403, C, FN			
1005	HC-AEO	00/00/2019	Archer document titled "VariantPlex TJH Custom CTL+SMAD4" Panel Product Insert VariantPlex Custom HS/HGC Panel	ARCHER00092133	ARCHER00092134	A, R, FRE 403, C, FN			
1006	HC-AEO	00/00/2019	Archer document titled "VariantPlex TJH Pancreas" Panel Product Insert VariantPlex Custom HS/HGC Panel	ARCHER00092135	ARCHER00092136	A, R, FRE 403, C, FN			
1007	HC-AEO	00/00/2019	Archer document titled "VariantPlex TP53" Panel Product Insert VariantPlex Custom HS/HGC Panel	ARCHER00092137	ARCHER00092138	A, R, FRE 403, C, FN			
1008	HC-AEO	00/00/2019	Archer document titled "VariantPlex TJH Brain" Panel Product Insert VariantPlex Custom HS/HGC Panel	ARCHER00092139	ARCHER00092140	A, R, FRE 403, C, FN			
1009	HC-AEO	00/00/2019	Archer document titled "VariantPlex SeraCare Custom Heme" Panel Product Insert VariantPlex Custom HS/HGC Panel	ARCHER00092141	ARCHER00092142	A, R, FRE 403, C, FN			
1010	HC-AEO	00/00/2019	Archer document titled "Universal cDNA" Panel Product Insert LiquidPlex Custom Panel	ARCHER00092143	ARCHER00092144	A, R, FRE 403, C, FN			
1011	HC-AEO	00/00/2020	Archer document titled "LiquidPlex SeraCare Gmini" Panel Product Insert LiquidPlex Custom Panel	ARCHER00092145	ARCHER00092146	A, R, FRE 403, C, FN			
1012	HC-AEO	00/00/2019	Archer document titled "FusionPlex Myeloid Focus" Panel Product Insert FusionPlex Custom Panel	ARCHER00092147	ARCHER00092148	A, R, FRE 403, C, FN			
1013	HC-AEO	00/00/2019	Archer document titled "FusionPlex NTRK" Panel Product Insert FusionPlex Custom Panel	ARCHER00092149	ARCHER00092150	A, R, FRE 403, C, FN			
1014	HC-AEO	00/00/2019	Archer document titled "FusionPlex TJH CTL" Panel Product Insert FusionPlex Custom Panel	ARCHER00092151	ARCHER00092152	A, R, FRE 403, C, FN			
1015	HC-AEO	00/00/2017	Archer document titled "Universal cDNA V1.0 Part # cGSP5081" Product Insert Universal cDNA V1.0	ARCHER00092153	ARCHER00092154	A, R, FRE 403, C, FN			
1016	HC-AEO	00/00/2019	Archer document titled "FusionPlex Pan Solid Tumor Panel" Product Insert FusionPlex Custom Panel	ARCHER00092155	ARCHER00092161	A, R, FRE 403, C, FN			
1017	HC-AEO	00/00/2017	Archer document titled "VariantPlex Myeloid Part # SK0123" Product Insert VariantPlex Myeloid	ARCHER00092162	ARCHER00092167	A, R, FRE 403, C, FN			
1018	HC-AEO	00/00/2014 - 00/00/2015	Excel Spreadsheet containing data relating to 2014-2105 sales; H3, LabCorp, SeraCare, Genosity, Thomas Jefferson, AstraZeneca	ARCHER00092168	ARCHER00092168	A, R, NR			
1019	HC-AEO		Excel Spreadsheet containing data relating to sales; H3, LabCorp, SeraCare	ARCHER00092169	ARCHER00092169	A, R, NR			
1020	HC-AEO		Excel Spreadsheet containing data relating to sales; H3, LabCorp, SeraCare	ARCHER00092170	ARCHER00092170	A, R, NR			
1021	HC-AEO	1/17/2018	Archer document titled "Analysis Unlimited Agreement between Analysis Unlimited and SeraCare Life Sciences, Inc."	ARCHER00092171	ARCHER00092179	A, R, FRE 403, C, FN			
1022	HC-AEO	10/24/2019	Confidentiality Agreement between SeraCare Life Sciences, Inc. and ArcherDX, Inc.	ARCHER00092180	ARCHER00092182	A, R, NR			
1023	HC-AEO	00/00/2019	Archer document titled "FusionPlex ALK RET ROS1 v2 Part # SK0081" Product Insert FusionPlex ALK RET ROS1 v2	ARCHER00092183	ARCHER00092184	A, R, FRE 403, C, FN			
1024	HC-AEO	00/00/2019	Archer document titled "FusionPlex Heme v2 Part # SK0086" Panel Product Insert; FusionPlex Heme v2	ARCHER00092185	ARCHER00092190	A, R, FRE 403, C, FN			
1025	HC-AEO	00/00/2018	Archer document titled "FusionPlex Lung Part # SK0133" Panel Product Insert FusionPlex Lung	ARCHER00092191	ARCHER00092193	A, R, FRE 403, C, FN			
1026	HC-AEO	7/24/2019	Archer document titled "Statement of Work (SOW) between AstraZeneca UK Limited and ArcherDX, Inc."	ARCHER00092766	ARCHER00092777	R, FRE 403			
1027	HC-AEO	11/13/2020	Laboratory Services Statement of Work #3 between ArcherDX, Inc. and Genosity	ARCHER00093200	ARCHER00093206	R, FRE 403			
1028	HC-AEO	6/3/2020	Laboratory Services Statement of Work #2 between ArcherDX, Inc. and Genosity	ARCHER00093207	ARCHER00093211	R, FRE 403			
1029	HC-AEO	2/2/2016	Archer document titled "Packing Slip # 17548 to Natera, Inc."	ARCHER00107900	ARCHER00107900	A, R, FRE 403, FN, H, MIL			
1030	HC-AEO	3/29/2016	Email from M. Pozek to A. Sosa, regarding "Invoice #1573 \$3244.89"	ARCHER00107907	ARCHER00107907	A, R, FRE 403, FN, H, MIL			
1031	HC-AEO	2/2/2016	Archer document titled "Invoice #71573" to Natera, Inc.	ARCHER00107921	ARCHER00107922	A, R, FRE 403, FN, H, MIL			
1032	HC-AEO	2/2/2016	LaunchWorks Manufacturing Lab document titled "Invoice #71573 to Natera, Inc."	ARCHER00107931	ARCHER00107932	A, R, FRE 403, FN, H, MIL			
1033	HC-AEO	3/7/2016	Email from A. Sosa to accountspay@natera.com regarding "Attn: Angelina Inv. 71573"	ARCHER00107946	ARCHER00107946	A, R, FRE 403, FN, H, MIL			
1034	HC-AEO	5/10/2016	Email from B. Stuenkel to Y. Bate and Accounts Receivable regarding "ArcherDX/LaunchWorks Invoice# 71573"	ARCHER00108000	ARCHER00108000	A, R, FRE 403, FN, H, MIL			
1035	HC-AEO	2/2/2016	LaunchWorks Manufacturing Lab document titled "Invoice #71573 to Natera, Inc."	ARCHER00108001	ARCHER00108001	A, R, FRE 403, FN, H, MIL			
1036	HC-AEO	2/18/2016	Email from S. Ryan to accountspay@natera.com regarding "Invoice #71573-Natera"	ARCHER00108015	ARCHER00108015	A, R, FRE 403, FN, H, MIL			
1037	HC-AEO	2/2/2016	Archer document titled "Invoice #71573 to Natera, Inc."	ARCHER00108016	ARCHER00108017	A, R, FRE 403, FN, H, MIL			
1038	HC-AEO	1/29/2016	Email from C. Finley to I. Zlatkovsky regarding "Order Placement: PO 106880 Natera"	ARCHER00108057	ARCHER00108057	A, R, FRE 403, FN, H, MIL			
1039	HC-AEO	3/10/2016	Email from T. Constantin to I. Zlatkovsky regarding "Re: Archer Protocol and Training"	ARCHER00108075	ARCHER00108076	A, R, FRE 403, FN, H, MIL			
1040	HC-AEO	3/14/2016	Email from T. Constantin to I. Zlatkovsky et al. regarding "Re: Archer Protocol and Training"	ARCHER00108080	ARCHER00108081	A, R, FRE 403, FN, H, MIL			
1041	HC-AEO	4/5/2016	Email from B. Hoang to C. Pierson et al. regarding "Re: FusionPlex Results?"	ARCHER00108084	ARCHER00108085	A, R, FRE 403, FN, H, MIL			
1042	HC-AEO	12/8/2015	Email from I. Zlatkovsky to N. Chopra regarding "Genes of Interest"	ARCHER00108122	ARCHER00108123	A, R, FRE 403, FN, H, MIL			
1043	HC-AEO	12/17/2015	Email from I. Zlatkovsky to N. Chopra regarding "Genes of Interest"	ARCHER00108124	ARCHER00108126	A, R, FRE 403, FN, H, MIL			
1044	HC-AEO	1/21/2016	Email from J. Pham to I. Zlatkovsky regarding "Natera quote and purchase"	ARCHER00108142	ARCHER00108142	A, R, FRE 403, FN, H, MIL			
1045	HC-AEO	1/22/2016	Email from I. Zlatkovsky to J. Pham regarding "Re: Natera quote and purchase"	ARCHER00108147	ARCHER00108148	A, R, FRE 403, FN, H, MIL			
1046	HC-AEO	1/22/2016	Email from I. Zlatkovsky to N. Chopra regarding "Genes of Interest"	ARCHER00108153	ARCHER00108154	A, R, FRE 403, FN, H, MIL			
1047	HC-AEO	1/26/2016	Email from C. Finley to I. Zlatkovsky and N. Chopra regarding "Re: Quote # 00000349 - 2016Jan Natera STP"	ARCHER00108161	ARCHER00108162	A, R, FRE 403, FN, H, MIL			
1048	HC-AEO	2/1/2016	Email from I. Zlatkovsky to T. Constantin and C. Pierson regarding "Re: Order Placement: PO 106880 Natera"	ARCHER00108188	ARCHER00108189	A, R, FRE 403, FN, H, MIL			
1049	HC-AEO	2/11/2016	Email from I. Zlatkovsky to T. Constantin et al. regarding "Archer Pre-Site"	ARCHER00108205	ARCHER00108205	A, R, FRE 403, FN, H, MIL			
1050	HC-AEO	2/19/2016	Email from C. Pierson to T. Constantin et al. regarding "FW: Archer Pre-Site"	ARCHER00108240	ARCHER00108242	A, R, FRE 403, FN, H, MIL			

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
1051	HC-AEO	3/2/2016	Email from C. Pierson to B. Hoang regarding "Archer Training"	ARCHER00108292	ARCHER00108292	A. R. FRE 403, FN, H, MIL			
1052	HC-AEO	3/2/2016	Email from B. Hoang to C. Pierson regarding "Re: Archer Training"	ARCHER00108293	ARCHER00108294	A. R. FRE 403, FN, H, MIL			
1053	HC-AEO	3/3/2016	Email from C. Pierson to B. Hoang regarding "Re: Archer Training"	ARCHER00108295	ARCHER00108296	A. R. FRE 403, FN, H, MIL			
1054	HC-AEO	3/10/2016	Email from A. Teator to B. Hoang regarding "Archer 4.0.6 VM"	ARCHER00108354	ARCHER00108355	A. R. FRE 403, FN, H, MIL			
1055	HC-AEO	3/10/2016	Email from I. Zlatkovsky to T. Constantin regarding "Archer Protocol and Training"	ARCHER00108356	ARCHER00108356	A. R. FRE 403, FN, H, MIL			
1056	HC-AEO		Archer document titled "Pre-Site Checklist"	ARCHER00108363	ARCHER00108365	A. R. FRE 403, FN, H, MIL			
1057	HC-AEO	3/14/2016	Email from B. Hoang to C. Pierson et al. regarding "Re: Archer Protocol and Training"	ARCHER00108382	ARCHER00108384	A. R. FRE 403, FN, H, MIL			
1058	HC-AEO	3/14/2016	Email from C. Pierson to B. Hoang et al. regarding "Re: Archer Protocol and Training"	ARCHER00108385	ARCHER00108388	A. R. FRE 403, FN, H, MIL			
1059	HC-AEO	3/16/2016	Email from C. Pierson to B. Hoang et al. regarding "Re: Archer Protocol and Training"	ARCHER00108390	ARCHER00108393	A. R. FRE 403, FN, H, MIL			
1060	HC-AEO	3/16/2016	Email from B. Hoang to C. Pierson in re "Re: Archer Protocol and Training"	ARCHER00108394	ARCHER00108397	A. R. FRE 403, FN, H, MIL			
1061	HC-AEO	3/16/2016	Email from C. Pierson to B. Hoang in re "Re: Archer Protocol and Training"	ARCHER00108398	ARCHER00108402	A. R. FRE 403, FN, H, MIL			
1062	HC-AEO	3/17/2016	Email from I. Zlatkovsky to B. Hoang in re "Archer Protocol and Training"	ARCHER00108404	ARCHER00108408	A. R. FRE 403, FN, H, MIL			
1063	HC-AEO	3/17/2016	Email from C. Pierson to B. Hoang in re "Re: Archer Protocol and Training"	ARCHER00108409	ARCHER00108413	A. R. FRE 403, FN, H, MIL			
1064	HC-AEO	3/18/2016	Email from B. Hoang to C. Pierson in re "Re: Archer Protocol and Training"	ARCHER00108414	ARCHER00108418	A. R. FRE 403, FN, H, MIL			
1065	HC-AEO	3/21/2016	Email from I. Zlatkovsky to C. Pierson, B. Hoang in re "Archer Protocol and Training"	ARCHER00108419	ARCHER00108424	A. R. FRE 403, FN, H, MIL			
1066	HC-AEO	3/22/2016	Email from C. Pierson to B. Hoang in re "Documents"	ARCHER00108429	ARCHER00108429	A. R. FRE 403, FN, H, MIL			
1067	HC-AEO	3/23/2016	Email from C. Pierson to B. Hoang in re "MBC Adapter sequences"	ARCHER00108541	ARCHER00108541	A. R. FRE 403, FN, H, MIL			
1068	HC-AEO	3/23/2016	Email from C. Pierson to B. Hoang in re "Analysis Manual"	ARCHER00108582	ARCHER00108582	A. R. FRE 403, FN, H, MIL			
1069	HC-AEO	3/23/2016	Email from C. Pierson to B. Hoang in re "Analysis Manual"	ARCHER00108586	ARCHER00108586	A. R. FRE 403, FN, H, MIL			
1070	HC-AEO	4/5/2016	Email from B. Hoang to I. Zlatkovsky in re "FusionPlex Results?"	ARCHER00108676	ARCHER00108680	A. R. FRE 403, FN, H, MIL			
1071	HC-AEO	4/5/2016	Email from C. Pierson to B. Hoang in re "FusionPlex Results?"	ARCHER00108684	ARCHER00108686	A. R. FRE 403, FN, H, MIL			
1072	HC-AEO	4/5/2016	Email from B. Hoang to I. Zlatkovsky in re "FusionPlex Results?"	ARCHER00108781	ARCHER00108784	A. R. FRE 403, FN, H, MIL			
1073	HC-AEO	7/24/2017	Archer Document titled "Archer Reveal cDNA Protocol for Illumina"	ARCHER01000515	ARCHER01000532	A. R. FRE 403, C, FN			
1074	HC-AEO		Archer, Advantages of AMP and Archer Platform	ARCHER01006133	ARCHER01006234	A. R. FRE 403, C, FN			
1075	HC-AEO		Document titled "Summary: Grounds for abstract rejection are"	ARCHER01006515	ARCHER01006520	A. R. FRE 403, C, FN, H			
1076	HC-AEO		Archer slide deck relating to "Archer Reveal cDNA 28"	ARCHER01007992	ARCHER01008031	A. R. FRE 403, C, FN			
1077	HC-AEO		Archer slide deck relating to "Archer Reveal cDNA 28"	ARCHER01008033	ARCHER01008084	A. R. FRE 403, C, FN			
1078	HC-AEO		Archer slide deck relating to "Archer Reveal cDNA 28"	ARCHER01008109	ARCHER01008161	A. R. FRE 403, C, FN			
1079	HC-AEO		Archer documents titled "Comprehensive MET mutation profiling by Anchored Multiplex PCR and next-generation sequencing"	ARCHER01010445	ARCHER01010445	A. R. FRE 403, C, FN			
1080	HC-AEO		Archer document titled "RNA-based Immune Repertoire Sequencing for Characterizing B-Cell Lineage Malignancy Clonality andIGHV Mutation Status"	ARCHER01010464	ARCHER01010464	A. R. FRE 403, C, FN			
1081	HC-AEO		Archer presentation titled "VariantPlex Myeloid Panels A new standard in mutation detection with Anchored Multiplex PCR"	ARCHER01010562	ARCHER01010600	A. R. FRE 403, C, FN			
1082	HC-AEO	10/00/2018	Archer presentation titled "ArcherDX Investor Presentation"	ARCHER01029018	ARCHER01029029	A. R. FRE 403, C, FN			
1083	HC-AEO		Archer presentation titled "Evolution of NGS-based detection of fusions, SNVs, and CNVs using Anchored Multiplex PCR"	ARCHER01045905	ARCHER01045954	A. R. FRE 403, C, FN			
1084	HC-AEO		ArcherDX presentation titled "Archer FusionPlex: The new standard in NGS-based gene fusion detection"	ARCHER01046872	ARCHER01046893	A. R. FRE 403, C, FN			
1085	HC-AEO		ArcherDX presentation relating to Reveal cDNA chemistry	ARCHER01048317	ARCHER01048349	A. R. FRE 403, C, FN			
1086	HC-AEO		ArcherDX document titled "Anchored Multiplex PCR enables sensitive NGS-based mutation detection in the context of large panels"	ARCHER01065558	ARCHER01065558	A. R. FRE 403, C, FN			
1087	HC-AEO	8/21/2014	Enzymatics documents titled "Weekly Update: 21Aug2014"	ARCHER01080455	ARCHER01080485	A. R. FRE 403, C, FN			
1088	HC-AEO		Zongli Zheng et al. "Anchored Multiplex PCR for Targeted Next Generation Sequencing" Massachusetts General Hospital, Department of Pathology, Boston MA, 02114, USA	ARCHER01082490	ARCHER01082490	A. R. FRE 403, C, FN			
1089	HC-AEO		Zongli Zheng et al. Draft of "Anchored Multiplex PCR for Targeted Next Generation Sequencing"	ARCHER01082491	ARCHER01082514	A. R. FRE 403, C, FN			
1090	HC-AEO		Archer document relating to "Figure 1. Archer Reveal cDNA library preparation steps"	ARCHER01084248	ARCHER01084262	A. R. FRE 403, C, FN			
1091	HC-AEO	5/20/2014	Archer Excel Spreadsheet containing data relating to registrants to "Clinically Actionable Gene Fusions Detected with NGS" webinar	ARCHER01223847	ARCHER01223847	A. R. FRE 403, C, FN, H			
1092	HC-AEO		VariantPlex H38-8800 V1.0 Part # cSA5055 Panel Product Insert; VariantPlex H38-8800 V1.0	ARCHER01419073	ARCHER01419074	A. R. FRE 403, C, FN			
1093	HC-AEO	5/1/2020	ArcherDX document titled "STRATAFIDE DNA Assay Procedure"; Document Number AP2, Rev 1	ARCHER01522835	ARCHER01522864	A. R. FRE 403, C, FN			
1094	HC-AEO	00/00/2014 - 10/00/2020	Excel Spreadsheet with Archer Customer and Sales Data	ARCHER01567478	ARCHER01567478	FRE 403			
1095	HC-AEO	5/1/2020	ArcherDX document titled "STRATAFIDE RNA Assay Procedure"; Document Number AP3, Rev 1	ARCHER01720453	ARCHER01720485	A. R. FRE 403, C, FN			
1096	HC-AEO	12/2/2016	ArcherDX FusionPlex Protocol for Illumina	ARCHER01844744	ARCHER01844767	A. R. FRE 403, C, FN			
1097	HC-AEO		Natera document "FMI Product Definition and Goals"; Outline.	NAT-AR-00170892	NAT-AR-00170894	R. FRE 403, FN			
1098	HC-AEO	6/16/2019	Documents titled "Term Sheet Foundation Medicine, Inc. & Natera, Inc."	NAT-AR-00432658	NAT-AR-00432676	R. FRE 403, FN			
1099	HC-AEO	6/4/2020	GCP/GLP Services Agreement between Natera, Inc. and Genentech, Inc.	NAT-AR-00702438	NAT-AR-00702474	R. FRE 403, FN			
1100	HC-AEO	12/20/2018	Statement of Work (SOW) between Medimmune, LLC and Natera, Inc.; Project AGEAN Study	NAT-AR-00702585	NAT-AR-00702589	R. FRE 403, FN			
1101	HC-AEO		Statement of Work (SOW) between Natera and Novartis Pharmaceuticals	NAT-AR-00702590	NAT-AR-00702592	R. FRE 403, FN			
1102	HC-AEO	7/15/2019	Research Agreement between Natera, Inc. and Novartis Pharmaceuticals Corporation	NAT-AR-00702593	NAT-AR-00702614	R. FRE 403, FN			
1103	HC-AEO	8/24/2018	Statement of Work (SOW) between Bristol-Myers Squibb Company and Natera, Inc.	NAT-AR-00702615	NAT-AR-00702621	R. FRE 403, FN			
1104	HC-AEO	5/5/2017	Email from M. Dantone to R. Hariharan re: "Colvera Qiagen Webinar"	NAT-AR-00152986	NAT-AR-00152992	A. R. FRE 403, C, FN, H			
1105	HC-AEO		Natera presentation "cDNA Competitor Analysis"	NAT-AR-00152993	NAT-AR-00153036	A. R. FRE 403, C, FN, H			
1106	HC-AEO	1/7/2016	Email from T. Constantin to J. Van Tornout re: "ALK fusions in lung cancer - references."	NAT-AR-00153826	NAT-AR-00153831	A. R. FRE 403, C, FN, H			
1107	HC-AEO	5/27/2017	First Amendment to Exclusive Patent License Agreement A217008.04	ARCHER018844045	ARCHER018844048	R. FRE 403, C			
1108			Primer3 Release 1.0.1 Manual			A. U. NR, R. FRE 403, FN, C, MIL			
1109	HC-AEO		FusionPlexSarcoma_10466	ARCHER01120791	ARCHER01120791	A. R. FRE 403, C, FN, H			
1110	HC-AEO		FusionPlexSolidTumor_10493	ARCHER01120792	ARCHER01120792	A. R. FRE 403, C, FN, H			
1111	HC-AEO		FusionPlexCTL_9749	ARCHER01120784	ARCHER01120784	A. R. FRE 403, C, FN, H			
1112	HC-AEO		FusionPlexLung_5855	ARCHER01120786	ARCHER01120786	A. R. FRE 403, C, FN, H			
1113	HC-AEO		FusionPlexORP_12257	ARCHER01120789	ARCHER01120789	A. R. FRE 403, C, FN, H			
1114	HC-AEO		STRATAFIDE_RNA_12929	ARCHER01120800	ARCHER01120800	A. R. FRE 403, C, FN, H			
1115	HC-AEO	10/26/2015	Archer, Custom Team Update	ARCHER01091292	ARCHER01091342	A. R. FRE 403, C, FN			
1116	HC-AEO	7/2/2020	Email from M. Yaylaoglu to S. Kim et al. regarding Re: Assay development strategies	ARCHER01200378	ARCHER01200379	A. R. FRE 403, C, FN, H			
1117	HC-AEO	12/18/2015	Archer, Weekly Update - Content	ARCHER01514444	ARCHER01514485	A. R. FRE 403, C, FN, H			
1118	HC-AEO	10/26/2015	Archer, Custom Team Update	ARCHER01517569	ARCHER01517619	A. R. FRE 403, C, FN, H			
1119	HC-AEO	7/2/2020	Email from A. Garnett to S. Kim et al. regarding RE: Assay development strategies	ARCHER01978662	ARCHER01978664	A. R. FRE 403, C, FN, H			
1120	HC-AEO	8/25/2017	Archer, Guidelines for UNC design for use of ArcherDX DNA assays in bisulfite sequencings	ARCHER02102029	ARCHER02102032	A. R. FRE 403, C, FN			
1121	HC-AEO	4/22/2016	Archer, Guidelines for Intellia use of ArcherDX DNA AMP kits	ARCHER02162508	ARCHER02162510	A. R. FRE 403, C, FN			
1122	HC-AEO	4/22/2016	Archer, Guidelines for Intellia use of ArcherDX DNA AMP kits	ARCHER02163112	ARCHER02163114	A. R. FRE 403, C, FN			
1123	HC-AEO	4/22/2016	Archer, Guidelines for Intellia use of ArcherDX DNA AMP kits	ARCHER02165884	ARCHER02165886	A. R. FRE 403, C, FN			
1124	HC-AEO	4/22/2016	Archer, Guidelines for Intellia use of ArcherDX DNA AMP kits	ARCHER02166086	ARCHER02166088	A. R. FRE 403, C, FN			

DTX Exhibit No.	Conf.	Date	Description	Bates Beg No.	Bates End No.	Natera's Objections	Admitted	Stipulated	Witness
1125	HC-AEO	4/22/2016	Archer, Guidelines for Intellia use of ArcherDX DNA AMP kits	ARCHER02286252	ARCHER02286254	A, R, FRE 403, C, FN			
1126	HC-AEO	2/14/2014	Press Release entitled: "Enzymatics Launches Archer™ Targeted Sequencing Technology to Dramatically Enhance Gene Mutation Identification and Discovery"	ARCHER00091706	ARCHER00091707	A, R, FRE 403, C, FN			
1127		9/15/2016	Archer® FusionPlex® Protocol for Illumina®	ARCHER01000658	ARCHER01000681	A, R, FRE 403, C, FN			
1128	HC-AEO	12/31/2014	Excel Spreadsheet listing sales data regarding multiple customers	ARCHER01006715	ARCHER01006715	A, R, FRE 403, H, NR			
1129	HC-AEO	11/25/2013	Document detailing steps for use of various Archer products	ARCHER01225167	ARCHER01225171	A, R, FRE 403, C, FN			
1130	HC-AEO		Enzymatics Manual for Archer, Custom Fusion Detection v1, Ion Torrent™ Platform, P/N AK0004-8	ARCHER01225421	ARCHER01225436	A, R, FRE 403, C, FN			
1131	HC-AEO		Enzymatics Manual for Archer, Custom Fusion Detection v1, Illumina Platform, P/N AK0002-8	ARCHER01225597	ARCHER01225614	A, R, FRE 403, C, FN			
1132	HC-AEO	00/00/2014	Excel Spreadsheet listing sales data regarding multiple customers	ARCHER01227575	ARCHER01227575	A, R, FRE 403, H, NR, FN			
1133	HC-AEO	3/11/2014	Email from J. Myers to everyone@enzymatics.com re: Genome Web	ARCHER01252827	ARCHER01252828	A, R, FRE 403, H, FN			
1134	HC-AEO		Enzymatics Manual for Archer, Custom Fusion Detection v1, Illumina Platform, P/N AK0002-8	ARCHER01279766	ARCHER01279781	A, R, FRE 403, C, FN			
1135	HC-AEO		Enzymatics Manual for Archer, Custom Fusion Detection v1, Illumina Platform, P/N AK0002-8	ARCHER01279889	ARCHER01279906	A, R, FRE 403, C, FN			
1136	HC-AEO		Excel Spreadsheet listing ArcherDX Products	ARCHER01306359	ARCHER01306359	A, R, FRE 403, C, FN			
1137	HC-AEO	01/01/2014-06/10/2016	Excel Spreadsheet listing Sales Totals by Customer/Part	ARCHER01310748	ARCHER01310748	A, R, FRE 403, H, NR, FN			
1138	HC-AEO	1/7/2014	Enzymatics Manual for Assessing adapter duplexes from IDT for specificity and purity by NGS	ARCHER01325286	ARCHER01325324	A, R, FRE 403, C, FN			
1139	HC-AEO		Draft of: Zheng, et al. <i>Anchored multiplex PCR for targeted next-generation sequencing</i>	ARCHER01325429	ARCHER01325452	R, FRE 403, FN, C, A, U, NR			
1140	HC-AEO	11/13/2020	Plaintiff Natera, Inc.'s Initial Claim Charts Relating Each Known Accused Product to the Asserted Claims Each Such Product Infringes			BRPL, H, R, FRE 403, C			
1141	HC-AEO	7/12/2021	Preliminary Infringement Claim Chart for Archer's Accused Products and the '814 Patent			BRPL, H, R, FRE 403, C			
1142	HC-AEO	7/12/2021	Preliminary Infringement Claim Chart for Archer's Accused Products and the '172 Patent			BRPL, H, R, FRE 403, C			
1143	HC-AEO	7/12/2021	Preliminary Infringement Claim Chart for Archer's Accused Products and the '482 Patent			BRPL, H, R, FRE 403, C			
1144	HC-AEO	7/12/2021	Preliminary Infringement Claim Chart for Archer's Accused Products and the '220 Patent			BRPL, H, R, FRE 403, C			
1145	HC	7/12/2021	Plaintiff Natera, Inc.'s Final Infringement Contentions			BRPL, H, R, FRE 403, C			
1146	HC-AEO	7/12/2021	Final Infringement Claim Chart for Defendants' Accused Products and the '814 Patent			BRPL, H, R, FRE 403, C			
1147	HC-AEO	7/12/2021	Final Infringement Claim Chart for Defendants' Accused Products and the '172 Patent			BRPL, H, R, FRE 403, C			
1148	HC-AEO	8/30/2021	ArcherDx, Inc.'s Second Supplemental Objections and Responses to Interrogatory No. 5			BRPL, H, R, FRE 403, C			
1149		2/16/2021	Defendants' Responses and Objections to Natera's Fourth Set of Requests for Production (Nos. 136-139)			BRPL, H, R, FRE 403, C			
1150	HC-OAEO		Archer Design History File Document "STRATAFIDE Assay Manufacturing Plan," Document Number DHF17-A-1-18, Rev. 1	ARCHER00045383	ARCHER00045385	A, R, FRE 403, C, FN			
1151	HC-AEO		Archer Design History File Document "ArcherDX MET Exon 14 ctDNA Assay Manufacturing Plan," Document Number P10091819, Rev. A	ARCHER01108155	ARCHER01108158	A, R, FRE 403, C, FN			
1152	HC-AEO		BOM Structure	ARCHER01838409	ARCHER01838412	A, R, FRE 403, C, FN			
1153	HC-AEO		Archer-MRD-002 Summary Technical File	ARCHER01137393	ARCHER01137395	A, R, FRE 403, C, FN			
1154	HC-AEO		Archer Design History File Document "Archer-MRD-M002 Assay Manufacturing Plan," Document Number: DHF15-A-1-4	ARCHER01869910	ARCHER01869911	A, R, FRE 403, C, FN			
1155	HC-AEO		Archer Document Change Request and PCR1 Primer P5-01 (DX0042/GMDX0041)	ARCHER01418864	ARCHER01418876	A, R, FRE 403, C, FN			
1156			Spreadsheet re Part Numbers and Part Description			A, R, FRE 403, FN			
1157			Archer Spreadsheet "Archer Reveal ctDNA 28 Kit, for Illumina (AB0021)"			A, R, FRE 403, FN			
1158			Spreadsheet re Stock Valuation Accounts			A, R, FRE 403, FN			
1159			Invalidity Chart of '708 Patent By Archer ALK, RET, ROS1 Fusion Detection Kit v1 (2014) ("ARRv1" (2014)*)			BRPL, H, R, FRE 403			
1160		4/3/2013	Metadata for ARCHER00091773			A, R, FRE 403, FN			
1161	HC-AEO	9/3/2021	Defendants' Objections and Responses to First Set of Requests for Admission (Nos. 1-20)			BRPL, H, R, FRE 403, C			
1162		2/5/2020	Corrected Notice of Allowability for U.S. Patent No. 10,590,482 (Ryan et al.)			BRPL, H, R, FRE 403, C			
1163		4/30/2021	Defendants' First Amended Invalidity Contentions			BRPL, H, R, FRE 403, C			
1164		6/2/2016	Khan Academy YouTube Video "Polymerase chain reaction (PCR) Biomolecules MCAT Khan Academy," https://www.youtube.com/watch?v=nHi-3JP6Mvc			A, R, FRE 403, FN, NR			
1165	HC-AEO	9/3/2021	Natera, Inc.'s Ninth Supplemental Responses and Objections to ArcherDX, Inc.'s First Set of Interrogatories (Nos. 1, 4-6) Pgs. 330-428 (Seventh Supplemental Response to Interrogatory No. 1)			BRPL, H, R, FRE 403, C			
1166	HC-AEO	12/6/2016	Archer document titled "Protocol-Archer-Reveal-ctDNA-28-Illumina (1)"	ARCHER01000533	ARCHER01000550	A, R, FRE 403, C, FN			
1167	HC-AEO	9/20/2017	Archer document titled "LA090.A Archer® Reveal ctDNA™ Protocol for Illumina®"	ARCHER01010630	ARCHER01010647	A, R, FRE 403, C, FN			
1168	HC-AEO	9/18/2017	Archer document titled "LA173.E Product Insert, Reveal ctDNA™ 28"	ARCHER01010648	ARCHER01010650	A, R, FRE 403, C, FN			
1169	HC-AEO	9/12/2017	Archer document titled "Revenue Detail 09.12.17"	ARCHER01010843	ARCHER01010843	A, R, FRE 403, FN, NR, H			
1170	HC-AEO	9/21/2016	Archer document titled "LA173-Product-Insert-Reveal-ctDNA-28"	ARCHER01012661	ARCHER01012663	A, R, FRE 403, C, FN			
1171	HC-AEO	3/20/2014	Archer document titled "ARCHER TARGETED SEQUENCING v3.3"	ARCHER01015019	ARCHER01015048	A, R, FRE 403, C, FN			
1172	HC-AEO	10/10/2013	Archer document titled "10 OCT 2013 Archer Dx Ion Protocol"	ARCHER01016198	ARCHER01016204	A, R, FRE 403, C, FN			
1173	HC-AEO	3/25/2013	Archer document titled "ArcherDx Training 2"	ARCHER01040008	ARCHER01040029	A, R, FRE 403, C, FN			
1174	HC-AEO	6/25/2013	Archer document titled "ArcherDx BOM-ADX001 Rev A_062513"	ARCHER01040579	ARCHER01040579	A, R, FRE 403, C, FN, H			
1175	HC-AEO	10/4/2013	Archer document titled "04_OCT_2013 Project Planning"	ARCHER01064192	ARCHER01064192	A, R, FRE 403, C, FN, H			
1176	HC-AEO	10/19/2013	Archer document titled "V3_Protocol"	ARCHER01081541	ARCHER01081544	A, R, FRE 403, C, FN			
1177	HC-AEO	2/6/2014	Archer document titled "19DEC2013_BETA_Iyo_v1DNA_WORKING"	ARCHER01082898	ARCHER01082911	A, R, FRE 403, C, FN			
1178	HC-AEO	10/21/2013	Archer document titled "ArcherDx_Illumina_Protocol"	ARCHER01083007	ARCHER01083014	A, R, FRE 403, C, FN			
1179	HC-AEO	8/12/2013	Archer document titled "V2_ArcherDx_Illumina_Protocol_Internal"	ARCHER01083022	ARCHER01083026	A, R, FRE 403, C, FN			
1180	HC-AEO	1/13/2014	Archer document titled "AK0001-8 Archer™ ALK, RET, ROS1 Fusion Detection v1 for Illumina®"	ARCHER01221310	ARCHER01221316	A, R, FRE 403, C, FN			
1181	HC-AEO	8/27/2013	Archer document titled "Platform Product Requirements Document 10Jan14"	ARCHER01224619	ARCHER01224622	A, R, FRE 403, C, FN			
1182	HC-AEO	1/15/2014	Archer document titled "Enzymatics Team Charter Archer Product Line - Draft 1"	ARCHER01225217	ARCHER01225224	A, R, FRE 403, C, FN			
1183	HC-AEO	2/24/2014	Archer document titled "AK0001-8 Archer™ ALK, RET, ROS1 Fusion Detection v1 for Illumina®"	ARCHER01225445	ARCHER01225445	A, R, FRE 403, C, FN, H, NR, Q, FRE 611			
1184	HC-AEO	2/6/2014	Archer document titled "Platform Product Requirements Document 15Jan14"	ARCHER01246320	ARCHER01246333	A, R, FRE 403, C, FN			
1185	HC-AEO	1/14/2014	Archer document titled "R&D Master Plan 2014 24FEB2014"	ARCHER01325033	ARCHER01325048	A, R, FRE 403, C, FN			
1186	HC-AEO	6/4/2014	Archer document titled "19DEC2013_BETA_Iyo_v1DNA_WORKING"	ARCHER01326162	ARCHER01326177	A, R, FRE 403, C, FN			
1187	HC-AEO	11/30/2016	Archer document titled "Design History ARR RNA Fusions for Ion v1"	ARCHER01362576	ARCHER01362595	A, R, FRE 403, C, FN			
1188	HC-AEO	6/4/2014	Archer document titled "AK0024-8 Universal RNA Design Report_03Jun14[1]"	ARCHER01510944	ARCHER01510959	A, R, FRE 403, C, FN			
1189	HC-AEO	1/14/2014	Archer document titled "LA174.A-Archer-Reveal-ctDNA-28-Protocol"	ARCHER01511122	ARCHER01511137	A, R, FRE 403, C, FN			
1190		7/30/2015	U.S. Patent Application Pub. No. 2015/0211050 A1 (Iafate et al.)			A, R, FRE 403, C, FN, U			
1191		11/14/2013	Patent Cooperation Treaty Application No. WO 2013/169339 A1 (Iafate et al.)	ARCHER00051980	ARCHER00052048	A, R, FRE 403, C, FN			
1192		5/10/2012	U.S. Patent Provisional Application No. 61/645,364			A, R, FRE 403, C, FN, U			
1193	HC-AEO	5/3/2012	Email from Z. Zheng to D. Dias-Santagata and L. Le regarding RE: TP53 and PTEN	ARCHER00090457	ARCHER00090457	FRE 403, R, H, FN, C, NR, A			
1194	HC-AEO		Targeted TNA-seq	ARCHER00090458	ARCHER00090458	FRE 403, R, FN, C, NR, A			
1195	HC-AEO	5/3/2012	Protocol for Targeted DNA sequencing using Ion Torrent	ARCHER00090459	ARCHER00090460	FRE 403, R, FN, C, NR, A			
1196	HC-AEO	4/23/2012	Email from D. Dias-Santagata to L. Le regarding RE: Capture slides	ARCHER00090463	ARCHER00090463	FRE 403, R, H, FN, C, NR, A			
1197	HC-AEO		TP53 gene	ARCHER00090464	ARCHER00090472	FRE 403, R, FN, C, NR, A			

R

EXHIBIT 12

Exhibit 12: Joint Trial Exhibit List

Exhibit No.	Description	Bates Number
JTX-0001	U.S. Patent No. 10,590,482	NAT-AR-00000396-NAT-AR-00000447
JTX-0002	U.S. Patent No. 10,538,814	NAT-AR-00000001-NAT-AR-00000198
JTX-0003	U.S. Patent No. 10,557,172	NAT-AR-00000199-NAT-AR-00000395
JTX-0004	U.S. Patent No. 10,597,708	NAT-AR-00000448-NAT-AR-00000871
JTX-0005	U.S. Patent No. 10,731,220	NAT-AR-00000872-NAT-AR-00001070
JTX-0006	Certified File History for U.S. Patent No. 10,557,172, Vol. 01	NAT-AR-00018873-NAT-AR-00020139
JTX-0007	Certified File History for U.S. Patent No. 10,557,172, Vol. 02	NAT-AR-00020140-NAT-AR-00021400
JTX-0008	Certified File History for U.S. Patent No. 10,557,172, Vol. 03	NAT-AR-00021401-NAT-AR-00022652
JTX-0009	Certified File History for U.S. Patent No. 10,557,172, Vol. 04	NAT-AR-00022653-NAT-AR-00023917
JTX-0010	Certified File History for U.S. Patent No. 10,557,172, Vol. 05	NAT-AR-00023918-NAT-AR-00025151
JTX-0011	Certified File History for U.S. Patent No. 10,557,172, Vol. 06	NAT-AR-00025152-NAT-AR-00026518
JTX-0012	Certified File History for U.S. Patent No. 10,557,172, Vol. 07	NAT-AR-00026519-NAT-AR-00027776
JTX-0013	Certified File History for U.S. Patent No. 10,557,172, Vol. 08	NAT-AR-00027777-NAT-AR-00029263
JTX-0014	Certified File History for U.S. Patent No. 10,557,172, Vol. 09	NAT-AR-00029264-NAT-AR-00030606
JTX-0015	Certified File History for U.S. Patent No. 10,557,172, Vol. 10	NAT-AR-00030607-NAT-AR-00032305
JTX-0016	Certified File History for U.S. Patent No. 10,557,172, Vol. 11	NAT-AR-00032306-NAT-AR-00033834
JTX-0017	Certified File History for U.S. Patent No. 10,557,172, Vol. 12	NAT-AR-00033835-NAT-AR-00035125
JTX-0018	Certified File History for U.S. Patent No. 10,557,172, Vol. 13	NAT-AR-00035126-NAT-AR-00036393
JTX-0019	Certified File History for U.S. Patent No. 10,557,172, Vol. 14	NAT-AR-00036394-NAT-AR-00036941
JTX-0020	Certified File History for U.S. Patent No. 10,538,814, Vol. 01	NAT-AR-00001071-NAT-AR-00001595
JTX-0021	Certified File History for U.S. Patent No. 10,538,814, Vol. 02	NAT-AR-00001596-NAT-AR-00003371
JTX-0022	Certified File History for U.S. Patent No. 10,538,814, Vol. 03	NAT-AR-00003372-NAT-AR-00004843
JTX-0023	Certified File History for U.S. Patent No. 10,538,814, Vol. 04	NAT-AR-00004844-NAT-AR-00006041
JTX-0024	Certified File History for U.S. Patent No. 10,538,814, Vol. 05	NAT-AR-00006042-NAT-AR-00007551
JTX-0025	Certified File History for U.S. Patent No. 10,538,814, Vol. 06	NAT-AR-00007552-NAT-AR-00009006
JTX-0026	Certified File History for U.S. Patent No. 10,538,814, Vol. 07	NAT-AR-00009007-NAT-AR-00010253
JTX-0027	Certified File History for U.S. Patent No. 10,538,814, Vol. 08	NAT-AR-00010254-NAT-AR-00011771
JTX-0028	Certified File History for U.S. Patent No. 10,538,814, Vol. 09	NAT-AR-00011772-NAT-AR-00013178
JTX-0029	Certified File History for U.S. Patent No. 10,538,814, Vol. 10	NAT-AR-00013179-NAT-AR-00014328
JTX-0030	Certified File History for U.S. Patent No. 10,538,814, Vol. 11	NAT-AR-00014329-NAT-AR-00015780

Exhibit 12: Joint Trial Exhibit List

JTX-0031	Certified File History for U.S. Patent No. 10,538,814, Vol. 12	NAT-AR-00015781-NAT-AR-00016888
JTX-0032	Certified File History for U.S. Patent No. 10,538,814, Vol. 13	NAT-AR-00016889-NAT-AR-00018090
JTX-0033	Certified File History for U.S. Patent No. 10,538,814, Vol. 14	NAT-AR-00018091-NAT-AR-00018872
JTX-0034	Certified File History for U.S. Patent No. 10,590,482, Vol. 01	NAT-AR-00036942-NAT-AR-00038192
JTX-0035	Certified File History for U.S. Patent No. 10,590,482, Vol. 02	NAT-AR-00038193-NAT-AR-00039512
JTX-0036	Certified File History for U.S. Patent No. 10,590,482, Vol. 03	NAT-AR-00039513-NAT-AR-00040755
JTX-0037	Certified File History for U.S. Patent No. 10,590,482, Vol. 04	NAT-AR-00040756-NAT-AR-00041981
JTX-0038	Certified File History for U.S. Patent No. 10,590,482, Vol. 05	NAT-AR-00041982-NAT-AR-00043324
JTX-0039	Certified File History for U.S. Patent No. 10,590,482, Vol. 06	NAT-AR-00043325-NAT-AR-00044552
JTX-0040	Certified File History for U.S. Patent No. 10,590,482, Vol. 07	NAT-AR-00044553-NAT-AR-00046099
JTX-0041	Certified File History for U.S. Patent No. 10,590,482, Vol. 08	NAT-AR-00046100-NAT-AR-00047338
JTX-0042	Certified File History for U.S. Patent No. 10,590,482, Vol. 09	NAT-AR-00047339-NAT-AR-00048775
JTX-0043	Certified File History for U.S. Patent No. 10,590,482, Vol. 10	NAT-AR-00048776-NAT-AR-00050154
JTX-0044	Certified File History for U.S. Patent No. 10,590,482, Vol. 11	NAT-AR-00050155-NAT-AR-00051481
JTX-0045	Certified File History for U.S. Patent No. 10,590,482, Vol. 12	NAT-AR-00051482-NAT-AR-00052739
JTX-0046	Certified File History for U.S. Patent No. 10,590,482, Vol. 13	NAT-AR-00052740-NAT-AR-00053978
JTX-0047	Certified File History for U.S. Patent No. 10,590,482, Vol. 14	NAT-AR-00053979-NAT-AR-00055135
JTX-0048	Certified File History for U.S. Patent No. 10,597,708, Vol. 01	NAT-AR-00055136-NAT-AR-00055845
JTX-0049	Certified File History for U.S. Patent No. 10,597,708, Vol. 02	NAT-AR-00055846-NAT-AR-00056866
JTX-0050	Certified File History for U.S. Patent No. 10,597,708, Vol. 03	NAT-AR-00056867-NAT-AR-00058418
JTX-0051	Certified File History for U.S. Patent No. 10,597,708, Vol. 04	NAT-AR-00058419-NAT-AR-00059936
JTX-0052	Certified File History for U.S. Patent No. 10,597,708, Vol. 05	NAT-AR-00059937-NAT-AR-00061050
JTX-0053	Certified File History for U.S. Patent No. 10,597,708, Vol. 06	NAT-AR-00061051-NAT-AR-00062668
JTX-0054	Certified File History for U.S. Patent No. 10,597,708, Vol. 07	NAT-AR-00062669-NAT-AR-00064367
JTX-0055	Certified File History for U.S. Patent No. 10,597,708, Vol. 08	NAT-AR-00064368-NAT-AR-00066141
JTX-0056	Certified File History for U.S. Patent No. 10,597,708, Vol. 09	NAT-AR-00066142-NAT-AR-00067400
JTX-0057	Certified File History for U.S. Patent No. 10,597,708, Vol. 10	NAT-AR-00067401-NAT-AR-00069245
JTX-0058	Certified File History for U.S. Patent No. 10,597,708, Vol. 11	NAT-AR-00069246-NAT-AR-00070234
JTX-0059	Certified File History for U.S. Patent No. 10,597,708, Vol. 12	NAT-AR-00070235-NAT-AR-00071239
JTX-0060	Certified File History for U.S. Patent No. 10,597,708, Vol. 13	NAT-AR-00071240-NAT-AR-00072262
JTX-0061	Certified File History for U.S. Patent No. 10,597,708, Vol. 14	NAT-AR-00072263-NAT-AR-00072754

Exhibit 12: Joint Trial Exhibit List

JTX-0062	Certified File History for U.S. Patent No. 10,731,220	NAT-AR-00086077-NAT-AR-00104527
JTX-0063	File History for U.S. Patent No. 10,731,220, Vol. 01	NAT-AR-00085440-NAT-AR-00086076
JTX-0064	File History for U.S. Patent No. 10,731,220, Vol. 02	NAT-AR-00072755-NAT-AR-00074481
JTX-0065	File History for U.S. Patent No. 10,731,220, Vol. 03	NAT-AR-00074482-NAT-AR-00078906
JTX-0066	File History for U.S. Patent No. 10,731,220, Vol. 04	NAT-AR-00078907-NAT-AR-00085439
JTX-0067	U.S. Provisional Patent Application 61/426,208 File History	NAT-AR-00262205-NAT-AR-00262256
JTX-0068	U.S. Provisional Patent Application 61/982,245 File History	NAT-AR-00262830-NAT-AR-00263061
JTX-0069	U.S. Provisional Patent Application 61/516,996 File History	NAT-AR-00262428-NAT-AR-00262525
JTX-0070	U.S. Provisional Patent Application 61/994,791 File History	NAT-AR-00263310-NAT-AR-00263919
JTX-0071	U.S. Provisional Patent Application 61/395,850 File History	NAT-AR-00262069-NAT-AR-00262124
JTX-0072	U.S. Provisional Patent Application 61/398,159 File History	NAT-AR-00262125-NAT-AR-00262204
JTX-0073	U.S. Provisional Patent Application 61/542,508 File History	NAT-AR-00262526-NAT-AR-00262691
JTX-0074	U.S. Provisional Patent Application 61/571,248 File History	NAT-AR-00262692-NAT-AR-00262711
JTX-0075	U.S. Provisional Patent Application 62/066,514 File History	NAT-AR-00263920-NAT-AR-00264213
JTX-0076	U.S. Provisional Patent Application 61/462,972 File History	NAT-AR-00262357-NAT-AR-00262427
JTX-0077	U.S. Provisional Patent Application 61/448,547 File History	NAT-AR-00262257-NAT-AR-00262356
JTX-0078	U.S. Provisional Patent Application 61/987,407 File History	NAT-AR-00263062-NAT-AR-00263309
JTX-0079	U.S. Patent Application 14/538,982 File History	NAT-AR-00253144-NAT-AR-00262068
JTX-0080	U.S. Patent Application 13/300,235 File History	NAT-AR-00244066-NAT-AR-00253143
JTX-0081	U.S. Patent Application No. 13/300,235	NAT-AR-00244080-NAT-AR-00244280
JTX-0082	Certified File History for U.S. Patent Application No. 13/300,235	NAT-AR-00535344-NAT-AR-00548264
JTX-0083	Certified U.S. Patent Application No. 13/300,235 Application	NAT-AR-00535344-NAT-AR-00535559
JTX-0084	U.S. Patent Publication 2012/0270212 (Rabinowitz)	NAT-AR-00704258-NAT-AR-00704350

EXHIBIT 13

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NATERA, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 20-125 (GBW)
)	(CONSOLIDATED)
ARCHERDX INC., ARCHERDX LLC, and)	
INVITAE CORPORATION)	
)	
Defendants.		

EXHIBIT 13: NATERA'S STATEMENT OF INTENDED PROOFS

Natera respectfully submits the following statement of intended proofs. Further details regarding these intended proofs have been explained at length in Natera's pleadings and discovery responses, including in its contentions, interrogatory responses, expert reports, by experts at depositions, and by fact witnesses at depositions, which Natera incorporates by reference. Natera reserves the right to revise, modify, supplement, or change its statement of intended proofs in response to subsequent Court rulings and/or to rebut Defendants' identification of issues of law and fact to be litigated and any alleged intended proof(s) or any new issues Defendants may raise, or for other good cause. The following statement of intended proofs is not exhaustive and Natera reserves the right to prove any matters identified in the pleadings and discovery responses, including in its contentions, expert reports, by experts at depositions, and by fact witnesses at depositions.

I. INFRINGEMENT OF THE PATENTS-IN-SUIT

A. Infringement of the '172 Patent¹

1. Natera will prove by a preponderance of the evidence that the use of the cfDNA Accused Products perform each step of the '172 Asserted Claims.

2. Natera will prove by a preponderance of the evidence that Defendants and their customers directly infringe, literally and/or under the doctrine of equivalents, the '172 Asserted Claims under 35 U.S.C. § 271(a) by performing the claimed process of the '172 Asserted Claims using the cfDNA Accused Products.

3. Natera will prove by a preponderance of the evidence that Defendants have induced customers to infringe the '172 Asserted Claims under 35 U.S.C. § 271(b) by

¹ Defendants bear the burden of showing that the disclosure-dedication doctrine allegedly bars application of the doctrine of equivalents for the '172 Asserted Claims. Natera, to the extent necessary, will introduce evidence to rebut Defendants' assertion that the disclosure-dedication rule allegedly bars application of the doctrine of equivalents for the '172 Asserted Claims.

encouraging customers to perform the claimed process of the '172 Asserted Claims using the cfDNA Accused Products. Natera will further prove by a preponderance of the evidence that Defendants were aware of the '172 Patent and knew or should have known that their customers' use of the cfDNA Accused Products according to the instructions provided by Defendants would infringe the '172 Patent.

4. Natera will prove by a preponderance of the evidence that Defendants have contributed to the infringement of the '172 Asserted Claims under 35 U.S.C. § 271(c) by selling the cfDNA Accused Products with the knowledge of the '172 Patent and knowledge that the cfDNA Accused Products were specially made or adapted for performing the claimed process and not a staple article or commodity for non-infringing use.

B. Infringement of the '220 Patent

5. Natera will prove by a preponderance of the evidence that the use of the cfDNA Accused Products perform each step of the '220 Asserted Claims.

6. Natera will prove by a preponderance of the evidence that Defendants and their customers directly infringe, literally and/or under the doctrine of equivalents, the '220 Asserted Claims under 35 U.S.C. § 271(a) by performing the claimed process of the '220 Asserted Claims using the cfDNA Accused Products.

7. Natera will prove by a preponderance of the evidence that Defendants have induced customers to infringe the '220 Asserted Claims under 35 U.S.C. § 271(b) by encouraging customers to perform the claimed process of the '220 Asserted Claims using the cfDNA Accused Products. Natera will further prove by a preponderance of the evidence that Defendants were aware of the '220 Patent and knew or should have known that their customers' use of the cfDNA Accused Products according to the instructions provided by Defendants would

infringe the '220 Patent.

8. Natera will prove by a preponderance of the evidence that Defendants have contributed to the infringement of the '220 Asserted Claims under 35 U.S.C. § 271(c) by selling the cfDNA Accused Products with the knowledge of the '220 Patent and knowledge that the cfDNA Accused Products were specially made or adapted for performing the claimed process and not a staple article or commodity for non-infringing use.

C. Infringement of the '708 Patent

9. Natera will prove by a preponderance of the evidence that the use of the '708 Accused Products perform each step of the '708 Asserted Claims.

10. Natera will prove by a preponderance of the evidence that Defendants and their customers directly infringe, literally and/or under the doctrine of equivalents, the '708 Asserted Claims under 35 U.S.C. § 271(a) by performing the claimed process of the '708 Asserted Claims using the '708 Accused Products.

11. Natera will prove by a preponderance of the evidence that Defendants have induced customers to infringe the '708 Asserted Claims under 35 U.S.C. § 271(b) by encouraging customers to perform the claimed process of the '708 Asserted Claims using the '708 Accused Products. Natera will further prove by a preponderance of the evidence that Defendants were aware of the '708 Patent and knew or should have known that their customers' use of the cfDNA Accused Products according to the instructions provided by Defendants would infringe the '708 Patent.

12. Natera will prove by a preponderance of the evidence that Defendants have contributed to the infringement of the '708 Asserted Claims under 35 U.S.C. § 271(c) by selling the '708 Accused Products with the knowledge of the '708 Patent and knowledge that the '708

Accused Products were specially made or adapted for performing the claimed process and not a staple article or commodity for non-infringing use.

D. Safe Harbor

13. Defendants bear the burden of proving by a preponderance of the evidence that their use of the STRATAFIDE and PCM products are protected by the safe harbor exemption under 35 U.S.C. § 271(e)(1) (“Safe Harbor Exemption”). Natera, to the extent necessary, will introduce evidence to rebut Defendants’ assertion that the use of the STRATAFIDE and PCM products are protected by the Safe Harbor Exemption.

II. REMEDIES²

14. Natera will prove by a preponderance of the evidence that it is entitled to lost profits related to Personalized Cancer Monitoring (“PCM”) sold or given away to customers and/or partners in, and outside, the United States and Puerto Rico (“U.S.”).

15. Natera will prove by a preponderance of the evidence that it is entitled to reasonable royalties related to Accused Products³ sold to customers and/or partners in, and outside, the U.S.

² Pursuant to Fed. R. Civ. P. 26, Defendants are required to supplement their production of damages-related financial documents. Natera requested supplementation of such documents through December 31, 2022 by March 31, 2023. Natera has not yet received all of Defendants’ supplemental financial information. Natera reserves the right to update its damages calculations in light of Defendants’ supplementation of this production, and seeks an accounting for damages incurred between the last date for which Defendants have provided adequate financial supplementation through the date of the verdict.

³ Accused Products, as used for this section, includes FusionPlex; VariantPlex; LiquidPlex; ArcherMET; the MET Variant Test on the RevealDX Assay for ctDNA (“the MetVar Test”); MET AMP Test on the RevealDX Assay for ctDNA (“MET AMP Test”); STRATAFIDE; MRD Assay for ctDNA; PCM, including PCM baseline tests and PCM monitoring tests that can be ordered from Invitae’s website, and equivalent tests provided before the PCM baseline and monitoring tests were publicized online, as well as any PCM offered as LDT or RUO.

16. Alternatively, and at a minimum, in the event Natera is not awarded lost profits, it will prove by a preponderance of the evidence that it is entitled to reasonable royalty damages for Accused Products sold to customers in, and outside, the U.S.

17. Natera will prove by a preponderance of the evidence that it is entitled to enhanced damages pursuant to 35 U.S.C. § 284, including prejudgment and post-judgment interest, as a result of Defendants' infringement of one or more of the Asserted Claims of the '172 Patent, the '708 Patent, and/or the '220 Patent.

18. Natera will prove by a preponderance of the evidence that it is entitled to attorneys' fees and costs pursuant to 35 U.S.C. § 285 as a result of Defendants' infringement of one or more of the Asserted Claims of the '172 Patent, the '708 Patent, and/or the '220 Patent.

19. Defendants bear the burden of proving that they are entitled to any remedies, including that this is an exceptional case and/or attorneys' fees and costs pursuant to 35 U.S.C. § 285 in the event one or more of the Asserted Claims of the Asserted Patents are found not infringed and invalid. Natera, to the extent necessary, will introduce evidence to rebut Defendants' assertion that they are entitled to any remedies, including that this is an exceptional case and/or attorneys' fees and costs pursuant to 35 U.S.C. § 285.

20. Natera will prove by a preponderance of the evidence that it is entitled to a permanent injunction enjoining each Defendant, its officers, agents, servants, employees, and those persons acting in active concert or participation with all or any of them from manufacturing, using, offering to sell, or selling and/or importing the Accused Products prior to the expiration of the selected patents, pursuant to 35 U.S.C. § 283.

III. VALIDITY

21. Defendants bear the burden of establishing by clear and convincing evidence that the Asserted Claims of the Asserted Patents are invalid as anticipated under 35 U.S.C. § 102. Natera, to the extent necessary, will introduce evidence to rebut Defendants' assertion that the Asserted Claims of the Asserted Patents are anticipated under 35 U.S.C. § 102.

22. Defendants bear the burden of establishing by clear and convincing evidence that the Asserted Claims of the Asserted Patents are invalid as obvious under 35 U.S.C. § 103. Natera, to the extent necessary, will introduce evidence to rebut Defendants' assertion that the Asserted Claims of the Asserted Patents are obvious under 35 U.S.C. § 103, such as evidence of secondary considerations of non-obviousness.

23. Defendants bear the burden of establishing by clear and convincing evidence that the Asserted Claims of the Asserted Patents are invalid for failure to satisfy the definiteness requirement of 35 U.S.C. § 112. Natera objects to Defendants' inclusion of this invalidity ground as an intended proof for the jury trial.⁴ Natera, to the extent necessary, will introduce evidence to rebut Defendants' assertion that the Asserted Claims of the Asserted Patents are invalid for failure to satisfy the definiteness requirement of 35 U.S.C. § 112.

24. Defendants bear the burden of establishing by clear and convincing evidence that the Asserted Claims of the Asserted Patents are invalid for failure to satisfy the written description requirement of 35 U.S.C. § 112. Natera, to the extent necessary, will introduce evidence to rebut Defendants' assertion that the Asserted Claims of the Asserted Patents are

⁴ As stated in Natera's Statement of Additional Matters (Exhibit 15 to the Pretrial Order), the parties do not dispute that satisfaction of Section 112, paragraph 2 is an issue of law to be decided by the Court. *Solomon v. Kimberly-Clark Corp.*, 216 F.3d 1372, 1380 (2000) (the "determination of whether a claim complies with section 112, paragraph 2, is 'drawn from the court's performance of its duty as the construer of patent claims'"). Natera requests that the Court address and rule on this issue to streamline the triable issues before the jury trial.

invalid for failure to satisfy the written description requirement of 35 U.S.C. § 112.

25. Defendants bear the burden of establishing by clear and convincing evidence that the Asserted Claims of the Asserted Patents are invalid for failure to satisfy the enablement requirement of 35 U.S.C. § 112. Natera, to the extent necessary, will introduce evidence to rebut Defendants' assertion that the Asserted Claims of the Asserted Patents are invalid for failure to satisfy the enablement requirement of 35 U.S.C. § 112.

26. Defendants bear the burden of establishing by clear and convincing evidence that the Asserted Claims of the Asserted Patents are invalid for failure to claim what the applicants regarded as their invention under 35 U.S.C. § 112. Natera objects to Defendants' inclusion of this invalidity ground as an intended proof for the jury trial.⁵ Natera, to the extent necessary, will introduce evidence to rebut Defendants' assertion that the Asserted Claims of the Asserted Patents are invalid for failure to claim what the applicants regarded as their invention under 35 U.S.C. § 112.

27. Defendants bear the burden of establishing by clear and convincing evidence that the Asserted Claims of the '172 and '220 Patents are invalid for failing to name the proper inventors under 35 U.S.C. § 102(f).⁶ Natera objects to Defendants' inclusion of improper inventorship defense under 35 U.S.C. § 102(f) as an intended proof for the jury trial. Correction, not invalidation, is the remedy for inventorship error and that is not an issue for jury trial.

⁵ As stated in Natera's Statement of Additional Matters (Exhibit 15 to the Pretrial Order), the parties do not dispute that satisfaction of Section 112, paragraph 2 is an issue of law to be decided by the Court. *Solomon v. Kimberly-Clark Corp.*, 216 F.3d 1372, 1380 (2000) (the "determination of whether a claim complies with section 112, paragraph 2, is 'drawn from the court's performance of its duty as the construer of patent claims'"). Natera requests that the Court address and rule on this issue to streamline the triable issues before the jury trial.

⁶ Natera objects to Defendants' inclusion of duplicative statements of intended proofs on this issue. See Ex. 14 (Defendants' Brief Statement of Intended Proofs), ¶¶ 12 and 18. Natera further objects to the extent Defendants are attempting to assert a new improper inventorship defense for the '708 Patent for the first time in the pretrial order.

Natera, to the extent necessary, will introduce evidence to rebut Defendants' assertion that the Asserted Claims of the '172 and '220 Patents are invalid for failing to name the proper inventors under 35 U.S.C. § 102(f).

28. Natera, to the extent necessary, will introduce evidence showing that the '172 and '220 Patents are entitled to claim priority to U.S. Provisional Patent Application No. 13/300,235 which was filed on November 18, 2011.

29. Natera, to the extent necessary, will introduce evidence showing that the '708 patent is entitled to claim priority to U.S. Provisional Patent Application No. 61/982,245 which was filed on April 21, 2014.⁷

30. Defendants bear the burden of establishing by clear and convincing evidence that the (1) the '172 and '220 Patents are unenforceable due to prosecution laches, inequitable conduct for improper inventorship, and unclean hands; and/or (2) '220 Patent⁸ is unenforceable due to inequitable conduct for failure to disclose materials to the United States Patent and Trademark Office. Natera objects to Defendants' inclusion of these equitable defenses as an intended proof for the jury trial.⁹ Natera, to the extent necessary, will introduce evidence to rebut Defendants' assertions of unenforceability of any of the Asserted Patents.

⁷ Natera objects to Defendants' inclusion of priority date being an issue for the '708 Patent. *See, e.g.,* 2021-10-01 Expert Report of Dr. Gregory M. Cooper Regarding Invalidity, at Section V.

⁸ Natera objects to Defendants' inclusion of the '172 Patent in their statement of intended proofs. Defendants have only asserted alleged inequitable conduct for failure to disclose materials to the United States Patent and Trademark Office with respect to the '220 Patent. *See* D.I. 441 (Defendants' Opposition to Natera, Inc.'s Motions for Partial Summary Judgment and to Preclude Certain Expert Testimony), at 28-30.

⁹ As stated in the parties' Pretrial Order cover pleading and Natera's Statement of Additional Matters (Exhibit 15 to the Pretrial Order), Natera requests that a separate bench trial be held on all equitable defenses asserted by Defendants. Further, the parties should be precluded from mentioning, introducing or otherwise relying on any evidence, argument or testimony relating to Defendants' equitable defenses during the jury trial because such issues are not relevant and will be prejudicial to the parties.

EXHIBIT 14

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

NATERA, INC.,)

Plaintiff / Counterclaim-Defendant,)

v.)

C.A. No. 20-125 (GBW)

ARCHERDX, INC., ARCHERDX, LLC and)
INVITAE CORP.,)

Defendants / Counterclaimants.)

EXHIBIT 14

DEFENDANTS' BRIEF STATEMENT OF INTENDED PROOF

Exhibit 14
Defendants' Brief Statement of Intended Proof

Pursuant to Delaware Local Rule 16.3(c)(8), Defendants ArcherDX, Inc., ArcherDX, LLC and Invitae Corporation (collectively, "Defendants") hereby submit the following brief statement of what Defendants intend to prove in support of its claims at trial, including the details of the damages claimed or of other relief sought. This statement is not intended to be exhaustive, and Defendants reserve the right to prove any matters identified in the pleadings, fact and expert discovery, and any of the accompanying statements of facts and legal issues to be litigated at trial. With respect to proof to be presented by expert testimony, Defendants incorporate by reference the reports and depositions of Defendants' expert witnesses addressing the issues identified below.

To the extent Defendants assert that Plaintiff Natera, Inc. ("Natera") has failed to meet its burden of proof on any issue, such statement does not constitute an admission that Defendants have any obligation to prove or disprove any element or any part of any claim or defense on which Defendants bear the burden of proof or production. Defendants do not assume the burden of proof or production as to any matter set forth below unless required to do so by law. Defendants reserve the right to modify or supplement its pretrial order materials, including this statement of intended proof, in response to any additional disclosures by Natera.

Defendants further reserve the right to amend and/or supplement this statement to the extent necessary to respond to issues raised by Natera, and to rebut any alleged proof(s) offered by Natera before and during trial, in response to rulings by the Court, or for any other reason.

Exhibit 14
Defendants' Brief Statement of Intended Proof

I. DEFENDANTS HAVE NOT DIRECTLY OR INDIRECTLY INFRINGED THE ASSERTED PATENTS

A. Direct Infringement

1. Natera must prove by a preponderance of the evidence that use of the cfDNA Accused Products constitute infringement of the Asserted Claims of the '172 and '220 Patents in violation of 35 U.S.C. § 271(a). Defendants will show that Natera has failed to meet its burden of proof on this issue. Defendants will present evidence to rebut Natera's assertions. For example, Defendants will show that use of the cfDNA Accused Products does not satisfy the limitations required by the '172 and '220 Patents, either literally or under the doctrine of equivalents. Defendants will also show that the disclosure-dedication doctrine bars application of the doctrine of equivalents for Asserted Claims of the '172 Patent.

2. Natera must prove by a preponderance of the evidence that use of the '708 Accused Products constitutes literal infringement of the Asserted Claims of the '708 Patent in violation of 35 U.S.C. § 271(a). Defendants will show that Natera has failed to meet its burden of proof on this issue. Defendants will present evidence to rebut Natera's assertions. For example, Defendants will show that use of the '708 Accused Products does not satisfy the limitations required by the '708 Patent.

3. Natera must prove by a preponderance of the evidence that Defendants, their academic and industry partners, their customers, and other third parties directly infringe the Asserted Claims of the '172 and '220 Patents by using the cfDNA Accused Products in an infringing manner in violation of 35 U.S.C. § 271(a). Defendants will show that Natera has failed

Exhibit 14
Defendants' Brief Statement of Intended Proof

to meet its burden of proof on this issue. Defendants will present evidence to rebut Natera's assertions.

4. Natera must prove by a preponderance of the evidence that Defendants, their academic and industry partners, their customers, and other third parties directly infringe the Asserted Claims of the '708 Patent by using the '708 Accused Products in an infringing manner in violation of 35 U.S.C. § 271(a). Defendants will show that Natera has failed to meet its burden of proof on this issue. Defendants will present evidence to rebut Natera's assertions.

B. Induced Infringement

5. Natera must prove by a preponderance of the evidence that Defendants have induced infringement of the '172, '220, and '708 Patents in violation of 35 U.S.C. § 271(b). Defendants will show that Natera has failed to meet its burden of proof on this issue. Defendants will present evidence to rebut Natera's assertions.

C. Contributory Infringement

6. Natera must prove by a preponderance of the evidence that Defendants have contributed to infringement of the '172, '220, and '708 Patents in violation of 35 U.S.C. § 271(c). Defendants will show that Natera has failed to meet its burden of proof on this issue. Defendants will present evidence to rebut Natera's assertions.

D. Safe Harbor

7. Defendants will prove by a preponderance of the evidence that use of the STRATAFIDE and PCM products are protected by the safe harbor of 35 U.S.C. § 271(e)(1).

Exhibit 14
Defendants' Brief Statement of Intended Proof

II. THE NATERA PATENTS ARE INVALID

A. Enablement

8. Defendants will prove by clear and convincing evidence that the Asserted Claims of the Asserted Patents are invalid for failure to satisfy the enablement requirement of 35 U.S.C. § 112.

B. Written Description

9. Defendants will prove by clear and convincing evidence that the Asserted Claims of the Asserted Patents are invalid for failure to satisfy the written description requirement of 35 U.S.C. § 112.

C. Indefiniteness

10. Defendants will prove by clear and convincing evidence that the Asserted Claims of the Asserted Patents are invalid for failure to satisfy the definiteness requirement of 35 U.S.C. § 112.

D. Failure to Claim what Applicant/Inventors Regarded as Their Invention

11. Defendants will prove by clear and convincing evidence that the Asserted Claims of the Asserted Patents are invalid for failure to claim what the Applicant/Inventors regarded as their invention in violation of 35 U.S.C. § 112.

E. Improper Inventorship

12. Defendants will prove by clear and convincing evidence that the Asserted Claims of the '172 and '220 Patents are invalid for improper inventorship in violation of 35 U.S.C. § 102(f).

Exhibit 14
Defendants' Brief Statement of Intended Proof

F. Priority Date

13. Defendants will rebut any evidence presented by Natera to show that the Asserted Claims of the '172, '220 and '708 Patents are entitled to priority dates prior to their application filing dates.

G. Anticipation

14. Defendants will prove by clear and convincing evidence that the Asserted Claims of the Asserted Patents are invalid as anticipated under 35 U.S.C. § 102.

H. Obviousness

15. Defendants will prove by clear and convincing evidence that the Asserted Claims of the Asserted Patents are invalid as obvious under 35 U.S.C. § 103.

I. Secondary Considerations

16. Defendants will rebut any evidence presented by Natera to show secondary indicia of non-obviousness, including commercial success, industry praise, copying, skepticism, and/or long-felt but unmet need, demonstrate that the claimed inventions of the Asserted Claims would not have been obvious. Defendants will also show that there is no nexus between the secondary considerations presented by Natera and the Asserted Patents.

J. Improper Inventorship

17. Defendants will prove by clear and convincing evidence that the Asserted Claims of the '172 and '220 Patents are invalid for failing to name the proper inventors under 35 U.S.C. § 102(f).

Exhibit 14
Defendants' Brief Statement of Intended Proof

III. THE NATERA PATENTS ARE UNENFORCEABLE

A. Prosecution Laches

18. Defendants will prove by clear and convincing evidence that the '172 and '220 Patents are unenforceable due to prosecution laches.

B. Improper Inventorship

19. Defendants will prove by clear and convincing evidence that the '172 and '220 Patents are unenforceable due to inequitable conduct for improper inventorship.

IV. REMEDIES

A. Lost Profits

20. Natera must prove that it is entitled to lost profits damages if infringement is found. Defendants will show that Natera has failed to meet its burden of proof on this issue. To the extent any damages are awarded, Defendants will present evidence to rebut Natera's asserted damages amount and royalty rate.

B. Reasonable Royalties

21. Natera must prove that it is entitled to reasonable royalties if infringement is found. Defendants will show that Natera has failed to meet its burden of proof on this issue. To the extent any damages are awarded, Defendants will present evidence to rebut Natera's asserted damages amount and royalty rate.

22. Natera must prove that it is entitled to reasonable royalties for foreign sales and for the practice of the accused methods that take place outside the United States. Defendants will present evidence to rebut Natera's asserted damages amount and royalty rate.

Exhibit 14
Defendants' Brief Statement of Intended Proof

C. Enhanced Damages

23. Natera must prove by preponderance of the evidence that it is entitled to enhanced damages, including prejudgment and post-judgment interest, pursuant to 35 U.S.C. § 284. Defendants will show that Natera has failed to meet its burden of proof on this issue. To the extent any damages are awarded, Defendants will present evidence to rebut Natera's asserted damages amount and royalty rate.

D. Permanent Injunction

24. Natera must prove that it is entitled to a permanent injunction restraining and enjoining use of the AMP technology used in the Accused Products, until the expiration of the Asserted Patents. Defendants will show that Natera has failed to meet its burden of proof on this issue. Defendants will present evidence to rebut Natera's assertions. For example, Defendants will show that Natera will not suffer irreparable harm if an injunction is not granted. Defendants will also show that there are other remedies at law. Defendants will show that the injury to Natera would not outweigh the harm to Defendants. Finally, Defendants will show that an injunction would be adverse to the public interest.

E. Exceptional Case

25. Natera must prove that the case is exceptional under 35 U.S.C. § 285. Defendants will show that Natera has failed to meet its burden of proof on this issue. Defendants will present evidence to rebut Natera's assertions.

26. In the event one or more of the Asserted Claims of the Asserted Patents is found not infringed and/or invalid, Defendants will prove that this is an exceptional case justifying an award of attorneys' fees under 35 U.S.C. § 285.

Exhibit 14
Defendants' Brief Statement of Intended Proof

F. Attorneys' Fees, Costs, and Litigation Expenses

27. In the event one or more of the Asserted Claims of the Asserted Patents is found not infringed and/or invalid, Defendants will prove that Defendants are entitled to its attorneys' fees, costs, and litigation expenses under 35 U.S.C. § 285.

EXHIBIT 15

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NATERA, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 20-125 (GBW)
)	(CONSOLIDATED)
ARCHERDX INC., ARCHERDX LLC, and)	
INVITAE CORPORATION)	
)	
Defendants.		

EXHIBIT 15: NATERA'S STATEMENT OF ADDITIONAL MATTERS

Natera respectfully submits the following statement of additional matters. Based on the current state of this action and the Court's rulings to date, Natera presents the following list of issues that it would like to address at the Pretrial Conference scheduled on May 4, 2023.¹ Natera reserves the right to revise, modify, supplement, or amend this list based on issues raised by Defendants, orders by the Court, negotiations between the parties, and/or for other good cause.

1. *DAUBERT* MOTIONS

On January 21, 2023, Natera filed its Motions for Partial Summary Judgment and to Preclude Certain Expert Testimony and accompanying materials. D.I. 429, 431, 432, 433. Defendants filed their opposition and accompanying materials on February 11, 2022. D.I. 441, 444. On February 25, 2022, Natera filed its reply and accompanying materials. D.I. 450, 451.

On January 21, 2022, Defendants filed their Motions for Summary Judgment and *Daubert* Motion to Exclude Expert Testimony and accompanying materials. D.I. 428, 430, 434. Natera filed its opposition and accompanying materials on February 11, 2022. D.I. 442, 443. On February 25, 2022, Defendants filed their reply and accompanying materials. D.I. 449, 452.

The Court has not yet ruled on the parties' *Daubert* motions. Resolution of these *Daubert* motions will streamline the jury trial by disposing of a number of evidentiary disputes.

2. CLAIM CONSTRUCTION ISSUES

a. The meaning of "at least 2 primers" as construed by the Court.

The construction of the disputed term "a melting temperature of the at least 2 primers" ('708 Patent, Claim 1) is an issue of law to be resolved by the Court in the first instance. As briefed and argued at the summary judgment hearing (D.I. 549), the parties dispute the interpretation of

¹ On April 6, 2023, Natera submitted a letter to the Court requesting resolution of certain issues discussed in this statement prior to the jury trial (D.I. 559). Defendants submitted a response on April 10 (D.I. 561). The parties' letters are pending before the Court.

the Court’s June 28, 2021 *Markman* Order construing the term—whether the term requires “at least 2 primers” of a potentially larger set of primers (as Natera asserts), or *all* of the primers (as Defendants assert), to have a melting temperature that is lower than the annealing temperature for the PCR reaction.

Specifically, Natera contended that the claim term only requires that there be at least 2 primers each having a melting temperature that is lower than the annealing temperature for the reaction conditions. D.I. 549, 73:13-81:24. As Natera noted, this construction was consistent with the Court’s *Markman* Order, including the language that “‘a’ melting temperature of two or more primers is not one measurement that relates to the whole of all the primers collectively, but instead refers to the specific melting temperature for each of the primers.” *Id.*; *see also* D.I. 243, 11. Conversely, Defendants argued that the Court’s *Markman* Order required that *all* of the primers have a melting temperature that is lower than the annealing temperature for the reaction conditions. D.I. 549, 67:15-69:20.

Natera requests that the Court address and rule on the parties’ claim construction dispute as to whether the disputed term “at least 2 primers” means “at least two” (Natera) or “all” (Defendants). The Federal Circuit has held that “[w]hen the parties raise an actual dispute *regarding the proper scope* of ... claims, the court, not the jury, must *resolve that dispute*.” *Sentient Sensors, LLC v. Cypress Semiconductor Corp.*, C.A. No. 19-1868-MN, 2021 WL 1966406, at *1 (D. Del. May 17, 2021) (citing *O2 Micro Int’l Ltd. v. Beyond Innovation Tech. Co.*, 521 F.3d 1351, 1360 (Fed. Cir. 2008)).

b. Defendants’ Section 112, paragraph 2 defenses.

Defendants have asserted that the patents-in-suit do not meet the requirements of Section 112, paragraph 2, namely that (1) the specification of a patent set forth in a claim what the applicant

regarded as his invention, and (2) it do so with sufficient particularity. It is undisputed that satisfaction of these two requirements is an issue of law to be decided by the Court. *Solomon v. Kimberly-Clark Corp.*, 216 F.3d 1372, 1380 (2000) (the “determination of whether a claim complies with section 112, paragraph 2, is ‘drawn from the court’s performance of its duty as the construer of patent claims’”).

Natera requests that the Court address and rule on Defendants’ Section 112, paragraph 2 defenses to streamline the triable issues before the jury trial.

3. DEFENDANTS’ SECTION 102(F) DEFENSE

Defendants have asserted that the Asserted Claims of the cfDNA Patents are invalid for failing to name the proper inventors under 35 U.S.C. § 102(f). “A patent cannot be invalidated if inventorship can be corrected instead.” *Egenera, Inc. v. Cisco Sys., Inc.*, 972 F.3d 1367, 1376 (2020); 35 U.S.C. § 256(b) (“The *error* of omitting inventors or naming persons who are not inventors *shall not invalidate the patent* in which such error occurred if it can be corrected as provided in this section”) (emphasis added). Correction, not invalidation, is the remedy for inventorship error.

Natera requests that the Court address and rule on Defendants’ Section 102(f) defense to streamline the triable issues before the jury trial.

4. EQUITABLE AND INJUNCTION ISSUES

Natera requests that a separate bench trial be held on any and all equitable defenses asserted by Defendants. The parties should be precluded from mentioning, introducing or otherwise relying on any evidence, argument or testimony during the jury trial relating to the equitable issues, including referencing the fact that each party sued the other without providing notice in advance of filing the lawsuit because such issues are not relevant and will be prejudicial to Natera, confuse

and mislead the jury, and divert the jury's attention from matters properly before them. Further, Defendants' suggestion that the Court seek an advisory verdict on the equitable defenses conflict with this district's case law. In fact, courts in this district routinely deny requests for advisory verdicts on equitable issues in patent cases, precisely because of the risk of prejudice and confusion. *See, e.g., CR Bard Inc. v. Angiodynamics Inc.*, C.A. 15-218, Memorandum and Order (D. Del. July 18, 2008) (declining request for advisory verdict on inequitable conduct defense); *Interdigital Commc'ns Inc. v. Nokia Corp.*, C.A. 13-10-RGA, 2014 WL 12465431 (D. Del. Aug. 28, 2014) (holding inequitable conduct is not a matter for the jury to decide); *IOENGINE, LLC v. PayPal Holdings, Inc.*, C.A. 18-452-WCB, 2022 WL 2800911, at *2 (D. Del. June 27, 2022) (granting motion in limine precluding defendants from introducing any evidence related to inequitable conduct to the jury). Instead, courts in this district consistently address equitable issues rather than sending them to a jury trial. *See, e.g., Chrimar Holding Company, LLC v. ALE USA Inc.*, 732 Fed. Appx. 876, 881 (Fed. Cir. 2018) (noting equitable defenses including prosecution laches were left to the court after jury trial); *Cancer Rsch. Tech. Ltd. v. Barr Labs., Inc.*, 625 F.3d 724, 727-728 (Fed. Cir. 2010) ("Prosecution laches is an equitable defense to the charge of infringement" and the defense was tried in a bench trial); *Intuitive Surgical, Inc. v. Computer Motion, Inc.*, No. 01-203-SLR, 2002 WL 31833867, *1 (D. Del. Dec. 10, 2002) (parties tried validity and damages issues to a jury and the issue of prosecution laches to the court).

Natera also requests that a separate bench trial be held on Natera's request for injunctive relief. Injunction is an issue of law for the Court to decide. The parties should be precluded from mentioning, introducing or otherwise relying on any evidence, argument or testimony during the jury trial regarding Natera's decision to seek injunctive relief and any suggestion that Natera will take Defendants' products off the market or put Defendants out of business because such issues

are not relevant and will be prejudicial to the parties.

Natera seeks the Court's guidance on when a separate bench trial will take place and the time the Court will allocate to address these issues.

5. NATERA'S REQUEST FOR UPDATED FINANCIAL INFORMATION

Natera has requested updated financial information on Defendants' sales so the most complete financial information may be presented to the jury for damages purposes. Although Defendants have committed to providing such information – and provided some of the requested information – Defendants still have not provided the below-listed information and will not commit to providing the updated information by a date certain such that it would allow Natera's experts to revise their damages positions in time for trial.

(1) Financial forecast information for PCM baseline tests and PCM monitoring tests that can be ordered from Invitae's website; and

(2) letters from Invitae to certain customers regarding its divestiture in certain products.

6. DEVELOPMENT OF DEFENDANTS' INFRINGING TECHNOLOGY AT MGH

The development of Defendants' infringing technology at Massachusetts General Hospital ("MGH") is not at issue in this case. The timing and development of the infringing technology at MGH is not relevant given that Defendants are not asserting prior invention by MGH under Section 102(g). Although a patent assigned to MGH, U.S. Patent No. 10,017,810 ("the '810 Patent"), has been alleged to be a prior art reference to the '172 and '220 Patents, the development at MGH of information disclosed in that patent is not relevant. Like any other prior art reference, what is relevant is the information disclosed by the patent. Any characterization of the '810 Patent as a patent covering the accused products is likely to engender jury confusion about whether a party can infringe if it has patents in the same area. The parties should be precluded from mentioning,

introducing or otherwise relying on any evidence, argument or testimony during the jury trial relating to development of Defendants' infringing technology at MGH or characterization of the '810 Patent as a patent covering the accused products.

EXHIBIT 16

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

NATERA, INC.,)	
)	
<i>Plaintiff / Counterclaim-Defendant,</i>)	
)	
v.)	
)	C.A. No. 20-125 (GBW)
ARCHERDX, INC., ARCHERDX, LLC and)	
INVITAE CORP.,)	
)	
<i>Defendants / Counterclaimants.</i>)	
_____)	

EXHIBIT 16

DEFENDANTS' STATEMENT OF ADDITIONAL MATTERS

Exhibit 16
Defendants' Statement of Additional Matters

Pursuant to Delaware Local Rule 16.3, Defendants ArcherDX, Inc., ArcherDX, LLC and Invitae Corporation (collectively, "Defendants") hereby submit the following additional matters:

1. Defendants seek the Court's ruling that the disclosure-dedication doctrine bars application of the doctrine of equivalents for the Asserted Claims of the '172 Patent.
2. The asserted claims of the '172 Patent recite "performing a first PCR ... using *a* universal primer" and "performing a second, nested PCR ... using *the* universal primer." As the Court ruled in its Memorandum Order on the parties' motions for summary judgment (D.I. 550), "[a]s a *matter of claim construction*, the use of the definite article 'the' in conjunction with 'universal primer' recited in the second PCR refers to the initial antecedent phrase 'universal primer' as referred to in the first PCR ... [t]hus, each claim of the '482, '172, and '814 patents require that the 'universal primer' used in the first PCR step be the same as 'the universal primer' used in the second PCR step." D.I. 550 at 8-9 (emphasis added). Therefore, Defendants respectfully request the Court's June 28, 2021 Claim Construction Order (D.I. 244) be amended to include a construction for "universal primer" that requires the universal primer used in the first PCR step be the same as the universal primer used in the second PCR step.
3. Defendants request the Court compel Natera to produce the deposition transcripts of Matthew Rabinowitz and Bernhard Zimmermann that were recently taken in *Natera v. CareDx*, Case No. 1:20-cv-00038-CFC-CJB. Defendants requested production of these transcripts on April 24, 2023, but have not received a response from Natera as of the filing date of the pre-trial order.
4. Defendants seek clarification on the claim term "a melting temperature of the at least 2 primers" in the '708 Patent, which was construed to mean "the temperature at which one-half (50%) of a DNA duplex of each primer and its perfect complement dissociates and becomes

Exhibit 16
Defendants' Statement of Additional Matters

a single strand of DNA.” D.I. 243 at 10-12. The Asserted Claims of the '708 Patent require “the annealing temperature for the reaction conditions is greater than a melting temperature of the at least 2 primer.” In the Court’s Memorandum Order on Claim Construction, Judge Stark noted that “[a]s the prosecution history makes clear, when multiple primers are involved, an annealing temperature that is *greater than* ‘a melting temperature of the at least 2 primers’ is one that is higher than each individual melting temperature of each primer.” D.I. 243 at 10-22 (emphasis in original). The parties dispute whether, as Defendants assert, the claim requires that all of the primers must have melting temperatures below the annealing temperature, or whether, as Natera asserts, only at least 2 of the primers of a potentially larger set of primers need to have melting temperatures below the annealing temperature.